# **EXHIBIT C**

Filed: 11/3/2015 2:49:14 PM JOHN D. KINARD - District Clerk Galveston County, Texas Envelope No. 7663325 By: Lisa Kelly 11/3/2015 4:03:38 PM

	15-CV-1	174 11/3/20
NO.		****
CELESTE STEIN DESIGNS, INC. PLAINTIFF,	\$ \$ \$	IN THE DISTRICT COURT OF
VS.	§	GALVESTON COUNTY, TEXAS
SCRUBSCO LTD., and	§ §	Galveston County - 405th District Court
THOMAS LANDRITH DEFENDANTS,	§	§ JUDICIAL DISTRICT COURT

## PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW PLAINTIFF CELESTE STEIN DESIGNS, INC., (hereinafter "Plaintiff Stein Designs") complaining of Defendants, SCRUBSCO, LTD. (hereinafter "Defendant SCRUBSCO") and THOMAS LANDRITH (hereinafter "Defendant Landrith"), in the course of his employment, and for causes of action respectfully shows the Court the following:

# DISCOVERY CONTROL PLAN

1. Pursuant to Tex. R. Civ. P. 190.1, Plaintiff intends to conduct discovery under Rule 190.3, Level 2.

## **PARTIES**

2. Plaintiff, CELESTE STEIN DESIGNS, INC., is a domestic corporation and doing business at 7801 Bayside Avenue, Galveston; TX, 77554.

Status Conference set 1-28-16

- 3. Defendant, SCRUBSCO, LTD., is a foreign limited liability company, duly organized and existing by virtues of the laws of the State of Ohio, doing business in the State of Texas, and may be served with citation and a copy of this petition through its registered agent, Thomas Landrith, at 5368 Pinecastle, West Chester, OH, 45069 or wherever it may be found.
- 4. Defendant, THOMAS LANDRITH, is a resident of the State of Ohio, and he may be served with citation and a copy of this petition at his place of business located at 5368 Pinecastle, West Chester, OH 45069.

#### Jurisdiction & Venue

- 5. The present Court has personal jurisdiction over the Plaintiff, STEIN DESIGNS, as it is a citizen of Texas with its principal place of business in Texas and Defendant SCRUBSCO and Defendant LANDRITH, in his individual capacity and in the course of his employment, both have minimum contacts with the State of Texas. The Court has subject matter jurisdiction as the amount in controversy is within the limits of the Court, and no other court has exclusive jurisdiction in that Plaintiff, STEIN DESIGNS, sues for total damages less than \$75,000.
- 6. Venue is proper in the present forum as this cause of action accrued in whole or in substantial part, in Galveston County, Texas, pursuant to Tex. Civ. Prac. & Rem. Code § 15.002.

## Request Pursuant To Rule 28

7. To the extent that Defendant SCRUBSCO is conducting business pursuant to a trade name or assumed name not listed as a named party to this suit, then suit is brought against Defendant SCRUBSCO and, pursuant to the terms of Rule 28 of the Texas Rules of Civil Procedure, Plaintiff hereby demands that upon answer to this suit, Defendant SCRUBSCO answer in its correct legal and assumed names.

## Factual Background

8. This suit is brought as an open account for the sale of goods and merchandise. As shown in the itemized and verified account attached hereto and on the dates evidenced in past invoices, Plaintiff STEIN DESIGNS sold goods to Defendant SCRUBSCO on a contract for an open account in the regular course of business. The names used on the account were those of Defendant, SCRUBSCO in their business enterprise. Defendant SCRUBSCO received and accepted the goods. (See attached Exhibit "E," Proof of Delivery). Upon acceptance, Defendant SCRUBSCO promised to and became bound to pay the agreed prices, as specifically shown in the past invoices. Defendant SCRUBSCO has yet to pay the amount due and owing of \$34, 452.00. (See Exhibit "A," Aged Receivables As of September 30, 2015). Plaintiff STEIN DESIGNS sent two letter demanding payment on past due invoices on July 28, 2015 and August 12, 2015, attached as Exhibit "B." The price for the goods accepted by Defendant SCRUBSCO were reasonable, fair and itemized in the invoices reflecting a request for payment. (See Celeste Stein Designs, Inc. itemized invoices, purchase orders, and outstanding Scrubsco Invoices attached as Exhibit "C"). Statements requesting payment were sent to Defendant SCRUBSCO and systematic

records of the debt have been kept by Plaintiff STEIN DESIGNS, INC. (See Celeste Stein Designs, Inc.'s Customer Ledgers for SCRUBSCO, attached as Exhibit "D").

- 9. Plaintiff STEIN DESIGNS has "designed and manufactured over 2 million pairs of printed socks, tights, and leggings." See www.celestestein.com/About. Plaintiff STEIN DESIGNS is one of the "leading manufacturers of printed hosiery" and is "internationally recognized for [their] design and production capabilities." Id. Specifically, Plaintiff STEIN DESIGNS designs and manufactures printed compression socks. In connection with its business activities, Plaintiff STEIN DESIGNS has innovatively developed its own compression socks, and its own patterns. Plaintiff STEIN DESIGNS manufactures, markets, and sells these compression socks to customers and potential customers, including Defendant SCRUBSCO. Further, Plaintiff STEIN DESIGNS has created and developed these compression socks and patterns at a substantial expense and burden. Defendant SCRUBSCO maintained an open account with Plaintiff STEIN DESIGNS and purchased several pattern compression socks over time. (Exhibit C).
- 10. In July of 2015, Defendant SCRUBSCO had a significant outstanding balance that was past due on that account. (Exhibit B and Exhibit C). Plaintiff STEIN DESIGNS notified Defendant SCRUBSCO of the stopped shipping of products until the outstanding balance was rightfully paid (See Exhibit "F"). In October, 2015, Defendant SCRUBSCO, with a significant balance still owed to Plaintiff STEIN DESIGNS, released a catalog by "Cutieful Distributions" "by SCRUBSCO," (catalog attached as Exhibit "G") that contained and marketed "Cutieful" compression socks as well as patterns exactly as those

innovatively designed and manufactured by Plaintiff STEIN DESIGNS. See http://www.mysockspot.com/aboutus.asp.

- 11. Defendant SCRUBSCO obtained these compression sock designs and patterns through improper means and under circumstances giving rise to a duty not to disseminate the trade secret without Plaintiff STEIN DESIGNS' permission.
- 12. Since obtaining and disseminating Plaintiff STEIN DESIGNS' innovative pattern designs and compression socks, Defendant SCRUBSCO has used them for purposes of marketing and selling those same designs for independent economic profit. Defendant SCRUBSCO is using Plaintiff STEIN DESIGNS' established designs to compete directly with Plaintiff STEIN DESIGNS in the same business industry. Plaintiff STEIN DESIGNS has incurred significant damages as a result of Defendant, SCRUBSCO'S, misappropriation and illegal use of Plaintiff STEIN DESIGNS'S compression socks and patterns.

#### Liability for the Debt

13. Plaintiff STEIN DESIGNS made proper demand, on July 28, 2015 and August 12, 2015, for payment on past due and owing invoices for the sale of goods to Defendant SCRUBSCO. Defendant SCRUBSCO has failed to pay the account balance due of \$34,452.00. All proper credits due to Defendant SCRUBSCO, if any, have been properly made. Defendant SCRUBSCO'S failure to comply with the demand for payment that is due and owing causes Defendant SCRUBSCO to be liable on this debt.

## Attorney's Fees

14. The failure of Defendant SCRUBSCO to pay the account balance owed to Plaintiff STEIN DESIGNS. has made it necessary for Plaintiff STEIN DESIGNS to employ the undersigned attorney to sue on the account. The claim for payment was presented to Defendant SCRUBSCO more than thirty (30) days prior to the filing of this suit and remains unsatisfied. *See* Exhibit "A" (demand letters) and Exhibit "B" (aged receivables). Plaintiff STEIN DESIGNS is entitled to recover reasonable and necessary attorney's fees.

# Liability for Misappropriation of Trade Secrets

- 15. Plaintiff STEIN DESIGNS was at all times material to this litigation the owner of trade secrets involving the compression socks themselves and the creative, innovative design and/or pattern, manufacturing and marketing of pattern compression socks.
- 16. Defendant SCRUBSCO improperly acquired the compression sock process and patterns designed by Plaintiff STEIN DESIGNS and misappropriated them to its own use by adopting the compression sock and its patterns of Plaintiff STEIN DESIGNS and using it to create a new product under Defendant SCRUBSCO'S business name and market the products in an October 2015 catalog for independent economic profit and in direct competition with Plaintiff STEIN DESIGNS.
- 17. Plaintiff STEIN DESIGNS incurred substantial damages as a direct and proximate result of Defendant SCRUBSCO'S illegal use of Plaintiff STEIN DESIGNS' compression socks and unique compression sock patterns manufactured for sale

nationwide. Further, this misrepresentation and misappropriation is wilful and malicious because Defendant SCRUBSCO has a past due balance with Plaintiff STEIN DESIGNS, including for the sale of compression socks, (Exhibit A, B and C).

## Damages for Misappropriation of Trade Secrets

18. As a result of Defendant SCRUBSCOS misappropriation of trade secrets through illegal use, Plaintiff STEIN DESIGNS has suffered actual and consequential damages in the form of lost profits and lost sales in an amount less than the minimum jurisdictional limit of this Court but not more than \$75,000. Defendant SCRUBSCO'S conduct of stealing Plaintiff STEIN DESIGNS' unique compression sock process and patterns and using them to obtain independent economic profit was committed intentionally, knowingly, and with disregard of Plaintiff STEIN DESIGNS' rights, thus Plaintiff STEIN DESIGNS is entitled to exemplary damages in an amount not less than the maximum amount permitted by applicable law but not more than \$75,000. As a result of releasing an October 2015 catalog marketing for sale the same style of unique compression socks and designs of Plaintiff STEIN DESIGNS, the Defendant SCRUBSCO used actual misappropriation to gain commercial advantage. Plaintiff STEIN DESIGNS requests permanent injunctive relief under Tex. Civ. Prac. & Rem. Code 134A.003.

Prejudgment Interest for Misappropriation of Trade Secrets

19. In addition to the above and foregoing allegations, Plaintiff STEIN DESIGNS further pleads its entitlement to prejudgment interest at the highest rate allowed by Texas law.

WHEREFORE, PREMISES CONSIDERED, Plaintiff STEIN DESIGNS prays that Defendant SCRUBSCO and Defendant LANDRITH be cited in terms of law to appear and answer herein, and that upon final hearing, Plaintiff STEIN DESIGNS recovers of and from the Defendant SCRUBSCO the principal sum of the unpaid account \$34,452.00, any interest, attorney's fees, actual damages, exemplary damages, the total of which will not exceed \$75,000, injunctive relief, all taxable costs of Court, and such other and further relief, at law and in equity, to which Plaintiff STEIN DESIGNS may show itself justly entitled to receive.

Respectfully submitted,

THE LAW FIRM OF ALTON C. TODD

By:

Alton C. Todd

State Bar No. 20092000

312 S. Friendswood Drive

Friendswood, Texas 77546

(281) 992-8633

(281) 648-8633 Facsimile

ATTORNEY FOR PLAINTIFF

NO	MANAGED - Notice that the second seco
. § §	IN THE DISTRICT COURT OF
9	GALVESTON COUNTY, TEXAS
§ § §	JUDICIAL DISTRICT COURT
AFFID	AVIT
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BEFORE ME, the undersigned authority, on this day personally appeared Celeste Stein, who, after being duly sworn by me deposed and stated the following pursuant to Texas Rule of Civil Procedure 185:

- My name is Celeste Stein. I am above the age of 18 years, of sound mind, capable of making this Affidavit and have personal knowledge of the facts stated herein.
- 2. The above claim evidenced by attached documents on unpaid account is within my knowledge;
- 3. The above claim is just and true.
- 4. The above claim is due.
- 5. All just and lawful offsets, payments and credits have been allowed.
- 6. The attached documents were made in the regular course of business; it was the regular course of business for an employee or representative of Celeste Stein Designs, Inc with personal knowledge of the act, event or condition to make the records or to transmit information to be included in them, and they were made at or near the time of the act, event or condition or reasonably soon thereafter.

Further, Affiant sayeth not.

Celeste Stein

Stein November

SWORN TO and SUBSCRIBED before me on this O

2015, to certify which witness my hand and seal of office

Notary Public in and for State of Texas

(

09/22/2015 3:50 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

@0002/0007

Page: 1

9/22/15 at 16:46:13.04

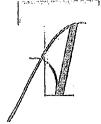
CELESTE STEIN DESIGNS INC.

**Aged Receivables** 

As of Sep 30, 2015
Filter Criteria includes: 1) IDs from SCRUBSCO to SCRUBSCO; 2) Includes Drop Shipments. Report order is by ID. Report is printed in Detail Format.

Customer ID Customer Bill To Contact Telephone 1	Involce/CM #	0-30	31-60	61-90	Over 90 days	Amount Due
SCRUBSCO SCRUBSCO 513-238-7190	16904 16938 16939			810.00 22,062.00	8,580.00	8,580.00 610.00 22,062.00
SCRUBSCO SCRUBSCO				22,872.00	8,560.00	31,452.00
Report Total	-			22,872,00	8,580.00	31,452.00





#### LAW FIRM OF ALTON C. TODD I H E

Alton C. Todd\* Jeffrey N. Todd\*\* Dana R. Todd\*\*\*

alton@actlaw.com jeff@actlaw.com dana@actlaw.com

Principal Office: 312 S. Friendswood Drive Friendswood, TX 77546 281,992,8633 Toll Free: 888,388,8633

July 28, 2015

Mr. Tom Landrith Scrubsco 8216 Princeton Glendale Rd, Box 199 West Chester, Ohio 45069

Vin First-Class Mail & Email tourlandrith@gmail.com

RE:

My client:

Celeste Stein Designs, Inc.

Past due invoices: \$34,452.00

Dear Mr. Landrith:

Please be advised that I have been retained to represent Celeste Stein Designs, Inc. to collect the above past due invoices in the amount of \$34,452.00. As I understand it, there is no question that you received the items and goods reflected on the invoices and that you have been in contact with Celeste Stein Designs, Inc. concerning your account. Unfortunately, you have not presented a viable payout to Celeste Stein Designs, Inc. Accordingly, the matter has been referred to me for collection. Before beginning the formal collection process, I would suggest that you contact Celeste Stein Designs, Inc. in a last effort to bring this past due account current. However, if this matter is not resolved within the very near future, I will have no other alternative than to file suit. If litigation is necessary, we will seek not only the past due amounts but additional sums as interest, costs and reasonable attorney fees.

Thanking you, I remain

Very truly yours,

Alton C. Todd

ACT/fff

Hoiston Office:

4141 Southwest Fronway Saire 300 Houston, 1X 77027

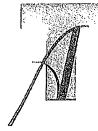
713.623.2337 www.altentodd.com \*Board Certified in Personal Injury Trial Law and Caril Trial Law by The Texas Board of Legal Specialization, National Board of Trial Advocacy. Licensed to practice in Georgia and Texas

> 28 Licensed to practice in Texas, New York, New Jersey and Georgia \*\*\* Licensed to practice in Texas. New Jersey and Georgia

> > Fax: 281.648,8633 - thefirm@actlaw.com

Atlanta Office:





# THE LAW FIRM OF ALTON C. TODD

Alton C. Todd\* Joffrey N. Todd\*\* Dana R. Todd\*\*\* alton@actlaw.com jelf@actlaw.com dana@actlaw.com Principal Office: 312 S. Friendswood Drive Friendswood, TX 77546 281.992.8633 Toll Free: 888.388.8633

August 13, 2015

Mr. Tom Landrith Scrubsco 8216 Princeton Glendale Rd, Box 199 West Chester, Ohio 45069 Via First-Class Mail & Email <u>tomlandrith@gmail.com</u>

RE:

My client:

Celeste Stein Designs, Inc.

Past due invoices: \$34,452.00

Dear Mr. Landrith:

Please be advised that I have been retained to represent Celeste Stein Designs, Inc. to collect the above past due invoices in the amount of \$34,452.00. As I understand it, there is no question that you received the items and goods reflected on the invoices and that you have been in contact with Celeste Stein Designs, Inc. concerning your account. Unfortunately, you have not presented a viable payout to Celeste Stein Designs, Inc. Accordingly, the matter has been referred to me for collection. Before beginning the formal collection process, I would suggest that you contact Celeste Stein Designs, Inc. in a last effort to bring this past due account current. However, if this matter is not resolved within the very near future, I will have no other alternative than to file suit. If litigation is necessary, we will seek not only the past due amounts but additional sums as interest, costs and reasonable attorney fees.

Thanking you, I remain

Very truly yours,

/s/ Alton C. Todd

Alton C, Todd

ACT/fff

Houston Office:

43 Southwest Fraeway Suite 300 Houston, TX 77027

713.623.2337

vvvv.altontodd.com

Board Certified in Personal Injury Frial Law and Civil Trial Law by The Texas Board of Legal Specialization, National Board of Trial Advocacy.
Licensed to practice in Georgia and Texas

\* Licensed to practice in Texas, New York, New Jersey and Georgia \* \* \* Licensed to practice in Texas, New Jersey and Georgia

Fax: 281,648,8633 - thefirm@actlaw.com

Atlanta Office:

1170 Peachtree Street Suite 1200 Atlanta, GA 30309

770,645,8633

www.altontoddlaw.com

#### **Outstanding Scrubsco Invoices**

Invoice

Invoice# Date

Due Date PO#

Paid

16904 5/29/2015 6/29/2015 1174 \$23,580.00 \$7,500.00 6/29/2015 Visa

\$3,000.00 6/25/2015 Check #1152

\$1,500.00 7/7/2015 Check #1154

\$11,580.00 Remaining Invoice Balance

16938 6/5/2015 7/5/2015 1173

\$810.00

16939 6/5/2015 7/5/2015 1174 \$22,062.00

\$22,872.00

\$34,452.00 Total Amount Due



# – Geleste stein designs inc.

The American Printcess
7801 Bayside Ave.
Galveston, TX 77554

(409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.colestestein.com

Sold To: \$CRUBSCO **02 16 PRINCETON GLENDALE RD BOX 199** WEST CHESTER, OH 45059 U\$A

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069 USA

Invoice Number:

Invoice Date:

Invoice

16904

5/29/15 Page: 1

P O Number Torms Ship Via 1174 Net 30 Days

Shin to:

Quantity	Item	Description	Unit Price	Extension
185.00	CMPS-1097	SUPPORT SOCK, BLUE MULTI HEARTS	6.00	1,110.00
	CWPS-1143	SUPPORT SOCK, TATTOO PARLOR	6.00	
	CMPS-1286	COMP SOX, 8-15, BLACK VOGUE	6.00	
420.00	CNIPS-1353	COMP SOCK, LEOPARD & ROSES	6.00	2,520.00
266.00	CIVIPS-1626	SUPPORT SOCK, RAINBOW 60'S	6.00	1,596.00
150.00	CMPS-1534	COMP SOX, 8-15, PINK BIKER HEART	6.00	900.00
200.00	CIMPS-1538	Support Sock, Bright Majik	6.00	1,200.00
250.00	CMP\$-1576	COMP SOX, 8-15, DENIM DOTTY	6.00	1,500.00
250.00	CMPS-1613	COMPRESSION SOCK, MEGAN	6.00	1,500.00
299.00	CMPS-1714	COMP SOX, 8-15, RED ALL TATTOO	6.00	1,794.00
150.00	CMPS-1721	SUPPORT SOCK, RASPBERRY HILL	6.00	900.00
90.00k	CMPS-1755	SUPPORT SOCK, RAINBOW LEOPARD	6.00	540.00
k	CMPS-1804	SUPPORT SOCK, MULTI PEACE	6,00	
65.00	CMPS-1806	COMP SOX, 8-15, BLACK FOUNTAIN	6.00	390,00
151.00	CIVIPS-1822	COMP SOX, 8:15, ABSTRACT ROSES	6.00	906.00
k;	CMPS-1851	COMP SOX, 8-15, BROWN LEOPARD RIVER	6.00	
-100.00k	MPS-1863	SUPPORT SOCK, CELESTENSTEIN	6.00	600.00
K	MP\$-1905	COMP SOX, 8-15, BABY OWLS	6.00	

Subtotat

Continued

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects a to report them to our effice. Cradit memos will only be granted if we find the item ( he a defect. Thank you for your business,

TOTAL

Continued

# celeste stein designs inc.

The American Printcess

Galveston, TX 77554 (409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To: SCRUBSCO 8216 PRINCETON GLENDALE RD **BOX 199** WEST CHESTER, OH 45069 USA

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069

Invoice Number:

Invoice Date:

Invoice

16904

6/29/15 Page: 2

USA

P O Number	Terms R	EP S	hip Via	Reference
1174	Net 30 Days	F	ED EX	L

c	MPS-1910 MPS-1940 MPS-1967	COMP SOX, 8-15 mm/Hg, BLUE LEOPARD COMP SOX, 8-15 mm/Hg, LEOPARD FLOWERS COMP SOX, 8-15 mm/Hg, STAR GAZER RED	6.00 8.00	1,500.00
1			l i	
195.00 C	MP9-1967	COMP SOX 8-15 mm/Hg, STAR GAZER RED	6.40	and the second s
		WHITE BLUE	6.00	1,170.00
147.00 CI	MPS-1988	COMP SOX, 8-15 mm/Hg, TURQ KLARA	6.00	882.00
C	MPS-340	COMP SOCK, 8-15, BLACKY	6.00	•
C	MPS-341	COMP SOX 8-15, mm/Hg, AUSTIN POWERS	6.00	
218.00 CI	MPS-450	COMP SOX, 8-15, BLACK BUTTERFLIES	6.00	1,308.00
CI	MPS-458	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	
274.00 CI	MPS-466	COMP SOX, 8-15, RAINBOW ZEBRA	6.00	1,644.00
Cr	MP\$-522	COMP SOX, 8-15, CHOCOLATES	6.00	
CI	MPS-587	COMP SOX, 8-15, PINK FUSCHIA CHEETAH	6.00	
270.00 CR	MPS-593	COMP SOCK 8-15 mm/Hg, HAIRY LEOPARP	6.00	1,620.00
(c)	MP8-809	SUPPORT SOCK, ZEBRA	6.00	
ica  Ca	MPS-1137	SUPPORT SOCK, COMIC	6.00	

Subtotal

23,580.00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects a to report them to our office. Credit memos will only be granted if we find the item t be a defect. Thank you for your business.

TOTAL

11,580.00

# colosto stein designs inc.

The American Printcess
7801 Bayside Ave.
Galveston, TX 77554
(409) 763-1009

(409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestastain.com

Sold To: SCRUBSCO 8216 PRINCETON GLENDALE RD **BOX 199** WEST CHESTER, OH 45069

USA

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069

Invoice Number:

Invoice Date:

Invoice

16938

6/5/15 Page: 1

USA

1	P O Mumber	Terms	REP	Ship Via	Reference	
ı	1173	Net 30 Days		FED EX		

Quantity	Item	Description	Unit Price	Extension
	CMPS-1247	SUPPORT SOCK, D' FEET BREAST CANCER	6.00	
	CMP5-1353	Comp sock, Leopard & Roses	6.00	
	CMPS-1526	SUPPORT SOCK, RAINBOW 60'S	6.00	
	CMPS-1676	COMP SOX, 8-15, DENIM DOTTY	6.00	
	CMPS-1714	COMP SOX, 8-15, RED ALL TATTOO	6.00	
1	CMPS-1765	SUPPORT SOCK, RAINBOW LEOPARD	6.00	
	CMPS-1848	COMP SOX, 8-15, PURPLE CUPCAKES	6.00	
ļ	CMPS-4850	SUPPORT SOCK, MULTI MOGO	6.00	
ļ	CIVIPS-1851	COMP SOX, 8-15, BROWN LEOPARD RIVER	6.00	
j	CMPS-1910	COMP SOX, 8-15 mm/Hg, BLUE LEOPARD	6.00	
	CMPS-1940	COMP SOX, 8-15 mm/Hg, LEOPARD FLOWERS	6.00	
ķ	CMPS-1967	COMP SOX, 8-15 mm/Hg, STAR GAZER RED	6.00	
		WHITE BLUE	!	
<b>k</b>	CMPS-2007	SUPPORT SOCK, BLUE CHEETAH HEART	6.00	
135.00	CMPS-2008	SUPPORT SOCK, PINK CHEETAH HEART	6.00	810.00
k	CMPS-458	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	
k	CMPS-593	COMP SOCK 8-15 min/Hg, HAIRY LEOPARP	6.00	

Subtotal

810,00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects a to report them to our office. Gradit mamos will only be granted if we find the item t ho a defect. Thank you for your business.

TOTAL

810.00

# ~celeste stein designs inc.

The American Printcess
7801 Bayside Ave.
Gaiveston, TX 77554

(409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To: 8216 PRINCETON GLENDALE RD **BOX 199** WEST CHESTER, OH 46069 USA

PONumber

Invoice Number:

Invoice

Invoice Date:

16939

6/5/15

Page: 1

Ship to:

**SCRUBSCO** 5368 PINECASTLE WEST CHESTER, OH 45069 USA

Ship Via

Reference

	1174	Net 30 Days		FED EX	
Quantity	ltem	Description	mendentar For 9	Unit Price	Extension
	CMPS-1097	SUPPORT SOCK, BLUE MULTI	HEARTS	6.0	0
165.00	CMPS-1143	SUPPORT SOCK, TATTOO PAI	RLOR	6.0	0.000
461.00	CMPS-1286	COMP SOX, 8-15, BLACK VOG	UE	6.0	0 2,766.0
1	CMPS-1353	COMP SOCK, LEOPARD & ROS	SES	6.0	0
,	CMPS-1526	SUPPORT SOCK, RAINBOW 60	)'\$	6.0	0
93.00	CMPS-1576	COMP SOX, 8-15, DENIM DOTT	Υ	6.0	0 558.0
ķ	CMPS-1714	COMP SOX, 8-15, RED ALL TAT	TOO	6.0	o
160.00	CMPS-1755	SUPPORT SOCK, RAINBOW LE	OPARD	6.0	0 960.0
347.00K	CMPS-1804	SUPPORT SOCK, MULTI PEAC	E	6.0	2,082.0
181.00¢	CMPS-1806	COMP SOX, 8-15, BLACK FOUN	ITAIN	6.0	1,086.0
k	IMPS-1822	COMP SOX, 8-15, ABSTRACT R	OSES	6.0	מ
200.00	MPS-1850	SUPPORT SOCK, MULTI MOGO	)	6.0	1,200.0
270.00	MPS-1851	COMP SOX, 8-15, BROWN LEO	PARD RIV	/ER 6.00	1,620.0
310.00	MPS-1905	COMP SOX, 8-15, BABY OWLS		6.00	1,860.0
C	MPS-1940	COMP SOX, 8-15 mm/Hg, LEOP	ARD FLO	WERS 6.00	)
200.00	WPS-1945	COMP SOX, 8-15 mm/Hg, 60' 5 i	DAISY RE	6.00	1,200.0
C	WPS-1967	COMP SOX, 8-15 mm/Hg, STAR	GAZER R	RED 6.00	
		WHITE BLUE			

Terms

Subtotal

Continued

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects a to report them to our office. Credit memos will only be granted if we find the item t be a defect. Thank you for your business.

TOTAL.

Continued

# -celeste stein designs inc.

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7801 Bayside Ava.
Galveston, TX 77554
(409) 763-1009

(409) 763-1084 Fex

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To: SCRUBSCO 8216 PRINCETON GLENDALE RD **BOX 199** 

WEST CHESTER, OH 45069 USA

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069

Invoice Number:

Invoice Date:

Invoice

16939

6/5/15 Page: 2

USA

P O Number	Terms	REP	Şhip Via	Reference
1174	Net 30 Days		FED EX	

	CMPS-1983	COMP SOX, 8-15 mm/Hg, SUZZI	6.00	900.0
c	NADE 4000	1		
	CMPS-1988	COMP SOX, 8-15 mm/Hg, YURQ KLARA	6.00	
100.00 C	MPS-264	SUPPORT SOCK, KITTY	6.00	600.00
100.00	MPS-265	SUPPORT SOCK, DOGGIE	6.00	600.0
277.00C	MPS-340	COMP SOCK, 8-15, BLACKY	6.00	1,662.0
c	MPS-341	COMP SOX 8-15, mm/Hg, AUSTIN POWERS	6.00	
þ	MP\$-450	COMP SOX, 8-15, BLACK BUTTERFLIES	6.00	
84.00 C	MPS-468	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	504.0
c	MFS-466	COMP SOX, 8-15, RAINBOW ZEBRA	6.00	
204.00C	MP8-522	COMP SOX, 8-15, CHOCOLATES	6.00	1,224.0
c	MPS-587	COMP SOX, 8-15, PINK FUSCHIA CHEETAH	6.00	
c	MPS-593	COMP SOCK 8-15 mm/Hg, HAIRY LEOPARP	6.00	
303.00C	MPS-809	SUPPORT SOCK, ZEBRA	6.00	1,818.0
60.00C	MPS-\$	COMP SOX, 8-15, SOLID BEIGE	2.00	120.0
28.00C	MPS-1137	SUPPORT SOCK, COMIC	6,00	168.0
24.00 C	MPS-1476	SUPPORT SOCK, CLASSIC HOUNDSTOOTH	6.00	144.0

Subtotal

22,062.00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects  $\epsilon$ to report them to our office. Credit memos will only be granted if we find the item t be a delect. Thank you for your business.

TOTAL

22,062.00

# Cutieful Distribution / Scrubsco

513-874-5486

# **Purchase Order**

8716 Princeton Glendale Rd BOX 199 West Chester, OH 45069 scrobscampany@amall.com Phone # 313-238-7190

cutieful4u@gmail.com cutileful4u.com Date P.O. No. 4/15/2015 1173

#### Vendór

Fax #

	CELESTE STEIN DESIGNS Galvaston, TX	
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#### Ship To

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069	
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Itom	Description	Qty	Rate	мри	Amount
1097- CMPSK	COMPRESSION SOCKS 8 15 MM	150	6,00		900.00
1031- CMP3K***	BLUE MULTI PART				600.00
1143-CMPSK	COMPRESSION SOCKS 8 15 MM HG	100	6,00		กแบเบบ
## · # · · · · · ·	TATTOO PARLOR	000	6.00		1,200,00
1247-CMPSK	COMPRESSION SOCKS & 15 MM HG	200	0.40		· '
4705 64001/	ID FEET BREAST CANCER COMPRESSION SOCKS B 15 MM HG	200	6.00		1,200.00
128G-CMPSK	BLACK VOGUE	"			200.00
1353-CMPSK	COMPRESSION SOCK 8 15 MM HG	50	6,00		300.00
1,000 11	LEOPARD AND ROSES	1			900.00
1526-CMP5K	COMPRESSION SOCKS 8-15MM HG	150	6,00		20000
	RAINBOW 60's	75	6.00		450.00
1534-CMPSK	COMPRESSION SOCKS 8 15 MM HG PINK BIKER HEARTS	1 "	3,017		
1538-CMPSK	COMPRESSION SOCK 8-15MM HG	75	6,00		450.00
1990,0141,3444	BRIGHT MAIL				900.00
1576-CMPSK	COMPRESSION SOCK 8 15 MM HG	150	6.00		900,00
	DENIM DOTTY		c an		300.00
1613-CMP\$K	COMPRESSION SOCK 8 15 MM HG	50	6.00		
that guards	MEGAN COMPRESSION SOCK 8 15 MM HG	150	6.00		900,00
1614-CMPSK	GREY DOT ART		3,00		
1671-CMPSK	COMPRESSION SOCK 8-15 MM HG	150	6.00		900,00
10/2 40/1 5000	BLUE FLEUR MISSONI				300.00
1714-CMPSK	COMPRESSION SOCKS 6 - 15 MM HG	50	6.00		300,00
	RED ALL TATTOO	100	6.00		600,00
1721-CMPSK	COMPRESSION SOCK B 15 MM HG	100	0.00		1
1755-CMP5K	RASPBERRY HILL COMPRESSION SOCK 8-15MM HG	100	6.00		600.00
1122-CM52674	RAINBOW LEOPARD	1	,,,,,		
	1	1 1		TANK MENTANTAN	AMACA TO THE PARTY OF THE PARTY

Total

Ship To

# Cutleful Distribution / Scrubsco

# **Purchase Order**

9216 Princeton Glendale Rd 80X 199 West Chester, OH 45069 ธตาประจากอุลกษุพิธีตาลป.com Phone # 513-238-7190 513-874-5486

Fax#

cutteful4u@gmail.com cutileful4u,com

P.O. No. Date 1173 4/15/2015

# Vendor CELES'TE STEIN DESIGNS Galviston, TX

SCRUBSCO 5366 PINECASTLE WEST CHESTER, ON 45069	

Item	Description	Qty	Rate	MPN	Amount
1804-CMP5K.	COMPRESSION SOCK 8-15MM HG	15D	6.00		900.00
200 y drii bitti	MULTI PEACE		[		1,200.00
1806-CMPSK	COMPRESSION SOCK 8-15 MM HG	200	6.00		1,200.00
	BLACK FOUNTAIN	1,50	6.00		00.00
1822-CMPSK	COMPRESSION SOCK 8 15MM HG	150	6.00		
	ABSTRACT ROSES	200	6:00		1,200.00
1848-CMPSK	COMPRESSION SOCKS 8 15 MM HG	1 ~~~	17,55		
1850-CMPSK	COMPRESSION SOCKS 8-15 MM HG	100	6.00		600.00
1950*CMP3V**	MULTI GIGO	1 ""			
1851-CMPSK	COMPRESSION SOCKS 8-15 MM HG	100	6.00		600.00
7031.0.0 phin	BROWN LEOPARD RIVER	) [	ı		900.00
1863 CMPSX8	COMPRESSION SOCK 8-15MM HG	150	6,00		300.00
	CELESTE STEIN				3,000,00
1905-CMPSK	COMPRESSION SOCKS 8-15 MM HG	500	6,00		( ),4,5,4,
	TINY OWLS	100	6.00		600,00
1910-CMP5K	COMPRESSION SOCK 8 15 MM HG	100	0.00		
	BLUE LEOPARD	50	6.00		300,00
1940-CMP5K	COMPRESSION SOCK 8 15 MM HG LEOPARD FLOWERS	701	7,40		
	LEOPARO FLOWEIG	[	1		
1945-CMPSK	COMPRESSION SOCK 8 15 MM HG	100	6,00		600.00
1343 Grill Dittit	60 S DAISIES	1 1	J		000.00
1967-CMPSK	COMPRESSION SOCK 8 - 15 MM HG	150	6.00		900,00
	STAR GAZER RWB	1			600.00
1983-CMPSK	COMPRESSION SOCK & 15 MM HG	100	6,00		000,00
	SUZZI				900.00
1988•CMP\$K	COMPRESSION SOCK 8 15 MM HG	150	6.00		
	TURQUOISE KLARA		1		

Total

# Cutleful Distribution / Scrubsco

8216 Princeton Gleridale Rd BOX 199 West Chester, OH 45069 scrubscompany@emil.com Phone # \$13-238-7190

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513-874-5406 Fax #

cutieful4u@agmail.com

cutileful4u,com

# **Purchase Order**

P.O. No. Date 1173 4/15/2015

#### Vendor

	CELESTE STEIN DESIGNS Gulveston, TX	
-		

#### Ship To

SCRUBSCO 5368 PINECASTLE	
WEST CHESTER, OH 45069	

Ytom	Description	Qty	Rate	MPN	Amount
	COMPRESSION SOCK 8-15 MM HG	200	6.00		1,200.00
2007 CMPSKB	BLUE CHEETAH HEART		6.00		1,200.00
2008 CMPSK8	COMPRESSION SOCK 8-15 MM HG PINK CHEETAH HEARTS	200			600.00
340-CMP\$K815	COMPRESSION SOCK, 8-15 mm Hg	100	6.00		600,00
341-CMP5K81S	Blockle COMPRESSION SOCK 8-15 MM HG	500	6.00		3,000.00
341-CM52K612	A. POWERS	200	6.00		1.800.00
450-CMPSKBIS	COMPRESSION SOCKS 8-15MM HG BLACK BUTTERFLY	300	0.00		500.00
458-CMPSK815	COMPRESSION SOCKS & 15 MM HG	100	6.00		600.00
ACE CHOCKOLE	BLUE CAM COMPRESSION SOCK & 15 MM HG	200	6.00		1,700.00
46G-CMPSK81S	PAINROW ZEBRA		- 00		600.00
593-CMPSK815	COMPRESSION SOCK 8 15 MM HG HAIRY LEOPARD	100	6.00		
809-CMPSK815	COMPRESSION SOCKS 8-15 MM HG	150	6,00		300.00
	FLOW ZEBRA COMPRESSION SOCK B-15 MM WHITE	100	2.00		200.00
1-CMPSK815 2-CMPSK815	COMPRESSION SOCK 8-15 MM BLACK	100	2.00		200.00 200.00
PINK CMPSK	PINK COMPRESSION SOCK 8-15MM HG	100	2.00		200107
		1 1			
					1

Total

\$35,400.00

Ship To

# Cutieful Distribution / Scrubsco

# Purchase Order

#216 Princeton Glendale Rd BOX 199 West Chester, OH 45069 scrollscompony@anali.com Phone # \$13-892-9765 Lax # 513-#74-5486

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culieful4u60gmail.com culileful4u.com 5/15/2015 1174

#### Vendor

CELESTE STEIN DESIGNS	
Girlveston, TX	

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45060
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Item	Description	Qty	Ràto	MPN	Amount
1097- CMP5K	COMPRESSION SOCKS 8 15 MM	100	6.00		600.00
IDAX- CURDICU	BLUE MULTI PART				900.00
1143-CMPSK	COMPRESSION SOCKS 8 15 MM HG	150	6.00		900.00
	TATTOO PARLOR	neo!	00.0		1,500.00
1247 CMPSK	COMPRESSION SOCKS 8 15 MM HG	250	i),uu		-,
ABOVE CAMPUT	D FEET BREAST CANCER COMPRESSION SOCKS 8 15 MM HG	250	6.00		1,500.00
1286-смР5К	BLACK VOGUE				. 500.00
1353-CMPSK	COMPRESSION SOCK B 15 MM HG	250	6.00		1,500,00
1333 GIR DIRRY	LEOPARD AND ROSES	1[			1,500.00
1526-CMPSK	COMPRESSION SOCKS 8-15MM HG	250	6.00		2,500.00
	RAINBOW 60's	100	6.00		600.00
1\$34-CMP5K	COMPRESSION SOCKS 8 15 MM HG	100	5,00		
1538-CMPSK	COMPRESSION SOCK 8-15MM HG	150	6.00		900.00
1330-046344	BRIGHT MAIL				90,00
1576-CMP5K	COMPRESSION SOCK & 15 MM HG	150	6.00		300,00
	DENIM DOTTY	150	6.00		900.00
1613-CMPSK	COMPRESSION SOCK # 15 MM HG	ran	0.00		
1614-CMPSK	MEGAN COMPRESSION SOCK 8 15 MM HG	250	6.00		1,500.00
1014-041/2011	IGREY DOT ART				
1671-CMPSK	COMPRESSION SOCK 0-15 MM HG	250	6.00		1,500.00
	BLUE FLEUR MISSONI	-73			1,500.00
1714-CMPSK	COMPRESSION SOCKS 8 - 15 MM HG	250	6.00		27.27.41.40
1721-CMPSK	RED ALL TATTOO COMPRESSION SOCK B 15 MM HG	150	6,00		900.00
TAST-CURSIC"	RASPBERRY HILL		3,50		1
1788-CMPSK	COMPRESSION SOCK 8-15MM HG	100	6.00		600.00
	RAINBOW LEOPARD				CONTRACTOR AND LANDSCORE

Total

## Cutieful Distribution / Scrubsco

513-074-548G

# Purchase Order

· 8216 Princaton Glendale Rd 80X 199 West Chester, OH 45069 scrubscompany@qmail.com Phone # 513-892-9265

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Cax #

cuthiful4u@gmail.com cuthighil4u.com 5/15/2015 1174

#### Vendor

CELESTE STEIN DESIGNS Galvuston, TX	

Ship To	and the second s
SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069	

Itom	Description	Qty	Ŕaţa	MPN	Amount
		100	6.00		600.00
1804-CMPSK	COMPRESSION SOCK 8-15MM HG	100	0.00		
1806-CMPSK	MULTI PRACE COMPRESSION SOCK 8-15 MM HG	250	6.00		1,500.00
1000-0-1-27	BLACK FOUNTAIN	- 1 1	1	,	500.00
1822-CMPSK	COMPRESSION SOCK 8 15MM HG	100	6,00		***************************************
	LARSTRACT ROSES	100	6.00		600.00
1830-CMPSK	COMPRESSION SOCKS 8-15 MM HG	100	0.92		
ARCH CHIRDIN	MULTI GIGO COMPRESSION SOCKS 8-15 MM HG	200	6,00		1.200.00
1851-CMPSK	BROWN CEOPARD RIVER				600.00
1863 CMPSK8		100	6.00		000.00
7000 OLY 20090	CELESTE STEIN	1	4 00		600.00
1905-CMP\$K	COMPRESSION SOCKS 8-15 MM HG	100	6.00		
	TINY OWLS	150	6.00		00.006
1910-CMP\$K	COMPRESSION SOCK 8 15 MM HG BLUE LEOPARD	1 100			
1940-CMP5K	COMPRESSION SOCK 8 15 NM HG	250	6,00		1,500.00
エコリングがいていいい	LEDPARD FLOWERS				
		100	6,00		600.00
1945-CMPSK	COMPRESSION SOCK & 15 MM HG	100	4.50		
	GO S DAISIES COMPRESSION SOCK 8 - 15 MM HG	100	6,00		600,00
1967-CMPSK	STAR GAZER RWB	1 1		'	600.00
1983-CMP\$K	COMPRESSION SOCK 8 15 MM HG	100	6.00		00,00
1505 0	SUZZI				600.00
1988-CMP5K	COMPRESSION SOCK 8 15 MM HS	100	6,00		
	TURQUOISE KLARA	100	6.00		600.00
264-CMP5R015	COMPRESSION SOCK 8- 15 MM HG	100			1
	I CFI FF				i
	1		. 1		TANK A CALL ST ST WAY AS A STATE OF THE STAT

Total

# Cutleful Distribution / Scrubsco

513-874-5486

# **Purchase Order**

8316 Princeton Glendale Rd 80X 199 West Chester, OH 45069 scrubscompany@gmbil.com Phone # 513-892-9265

cuticful4u@gmbil.com cutileful4u.com Date P.O. No. 5/15/2015 1174

#### Vender

Fax #

CELESTE STEIN DESIGNS Galvoston, TX	

	Ship To	
1	SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069	

Item	Description	Qty	Rate	MPN	Amount
	The state of the s	100	6,00		600,00
265-CMPSK815	COMPRESSION SOCK 8 -15 MM HG DOGGIE	1 .00	W/40		
340-CMP\$K815	COMPRESSION SOCK 8-15 mm Hg	150	6.00		900,00
	Blackle				600.00
341-CMP5K815	COMPRESSION SOCK 8-15 MM HG A. POWERS	100	6.00		
450-CMP5K81S	COMPRESSION SOCKS 8-15MM HG	200	6.00		1,200.00
すうひ・ごねれないロエン	BLACK BUTTERFLY	- 1 - 1	- 1		600.00
458-CMP5K815	COMPRESSION SOCKS 8 15 MM HG	100	6.00		400,00
	BLUE CAM	450	6.00		900.00
466-CMPSK815	COMPRESSION SOCK B 15 MM HG	150	0.00		
	RAINBOW ZEBRA COMPRESSION SOCKS 8-15 MM HG	100	6.00		600.00
522-CMPSK815	CHOCOLATES	]			900.00
587-CMPSK815	COMPRESSION SOCK 8-15 mm Hg	150	6.00		900,00
307 31 11	Plnk Fuchsia Cheotah	ا ؞؞ ا	6.00		600.00
593-CMPSK815	COMPRESSION SOCK 8 15 MM HG	100	0.110		1
non AMAGUASE	HAIRY LEOPARD COMPRESSION SOCKS 8-15 MM HG	250	6.00		1,500,00
809-CMPSK815	FLOW ZERRA				120.00
7-CMPSK815	COMPRESSION SOCK 8-15MM BEIGE	60	2.00		120.00
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#17				- LANDARD CONTRACTOR C	

Total

\$36,420.00

08/22/2015 3:56 PM FAX 408 763 1084

CELESTE STEIN DESIGNS

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9/22/15 at 16:47:94,30

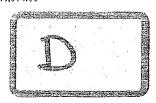
Page: 1

## CELESTE STEIN DESIGNS INC.

**Customer Ledgers** 

For the Period From Jan 1, 2013 to Sep 30, 2015 Filter Criteria Includes: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Report la printed in Delmit Format.

	****** * **					
Customer ID Customer	Date Y	rans No	Туре	Debit Aint	Gredit Amt	Balanço
SCRUBSCO	5/9/13 13	3266	SJ	1,770.00		1,770.00
SCRUBSCO		309	Sj	3,342.00		8,112.00
		1346	នវ	1,224.00		6,336.00
	6/11/13 13	3346	SJ	1,746.00		8,082.00
		23/1124	ÇRJ		5,112.00	2,970,00
		1424	SJ	2,484.00		5,454,00
	7/3/13 13	1425	&J	992.47		6,446,47
	7/17/13 1		CRJ		2,970.00	3,476,47
		513	SJ	1,134.42		4,610,89
	8/8/13 1	non.	CRJ		3,476,47	1,134.42
		586	Si	1,303.45		2,437.87
		588 888	SJ.	972.00		3,409.07
		620	SI	334.41	4.48.48	3,744.28
		6/13 669	ÇRJ	004.00	1,134.42	2,609.86
		670	SJ e i	864,00		3,473.86
		13/13	SJ Crj	3,960.00	9 496 AB	7,433.86
		20/13	CRJ		2,275,45 334,41	5,158.41
		731	\$J	2,196.00	994.41	4,824.00 7,020.00
		732	รั้ง	4,060.00	•	11,070.00
		786	ŠĬ	4,260.00		15,330.00
		789	ŠĴ	6,000.00		21,330.00
		/08/13	CRJ	0,000,000	864.00	20,466.00
	10/11/13 56:		CRJ		3,960.00	16,506.00
		928	ŠJ	3,540.00	13,000.00	20,046.00
		21/13	CRJ	410.44.4	6,246,00	13,800,00
		390	SJ	1,044.00	41000000	14,844.00
	10/25/13 139		SJ	13,344.00		28,188.00
	11/5/13 11/	5/13	CRJ	,	6,000.00	22,188.00
	11/7/13 139		ŞJ	3,198,00	•	25,386.00
		12/13	CRJ	•	4,260,00	21,126.00
		13/13	ÇRJ		2,000.00	19,126.00
	11/18/13 11/	14/13	CRJ		1,500,00	17,820,00
	11/18/13 11/	16/13	CRJ		40.00	17,586.00
			ÇRJ		1,044.00	16,542.00
	12/2/13 100		CRJ	1 242 22	13,344.00	3,198.00
	12/8/13 141 12/6/13 141	01 60	<u>S</u> J	1,542.00		4,740.00
			SJ	5,544.00		10,284.00
	12/6/13 141 12/6/13 141		sj Sj	3,491.00		13,775.00
	12/6/13 141		SĴ	3,456.00 1,368.00		17,291.00 18,599.00
	12/13/13 100		CRJ	1,500,00	3,198.00	15,401.00
	1/8/14 100		CRJ		7,086,00	8,315,00
	1/8/14 100		CRĴ		1,368.00	6,947.00
	1/10/14 100		ÇRJ		3,491.00	3,456.00
	1/17/14 101		ĊŔĴ		3.456.00	00.0
	1/23/14 145		รม	160.00	.,	160.00
	1/24/14 145		ร์ม	10,938.00		11,008.00
	277/14 1450		8.7	1,422.00		12,520.00
	2/7/14 1458	87 :	ŝJ	12,342.00		24,862.00
			CRJ		11,098,00	13,764.00
	2/25/14 146	73 ;	3 <i>)</i>	5,586.00		19,320,00
	3/7/14 1470		3.1	1,230.00		20,860.00
	3/7/14 147		لية	168.00		20,718.00
	3/7/14 147		3.1	4,368,00		28,086.00
	3/7/14 1471		3.J	00,070,0		31,762.00
			JRJ		12,096.00	19,666.00
			MJ.	and an	1,422,00	18,244.00
	3/20/14 1475		IJ	222,00		10.466.00
	3/20/14 1475		ij	84.00		18,550,00
	3/20/14 1478		j) Vi	8,166,00		26,716.00
	3/25/14 1477		}.l	3,456.00	£ 21 0 44	30,172.00
	3/26/14 1013	scrups (	TR.)		6,566,00	24,616.00



00/22/2015 3:56 PM FAX 400 763 1084

CELESTE STEIN DESIGNS

@0001/0007

9/22/16 at 16:47:54,35

Page: 2

# CELESTE STEIN DESIGNS INC.

Customer Ledgers
For the Period From Jan 1, 2013 to Sep 30, 2015
Filter Criteria Includes: 1) IDa from SCRUBSCO to SCRUBSCO. Report order is by ID. Report is printed in Datell Format.

Cuntagna IC	Dato	Trans No	Type	Debit Amt	Crodit Amt	Balanoe
Customer (D Customer	Oako	Traite III				
				37.00		24,663,00
	3/27/14	14794	8J 8J	276,00		24,929,00
	3/27/14	14795 14796	SJ	1,638.00		26,567.00
	3/27/14 3/27/14	14797	šj	11,178,00		37,745.00
	4/3/14	1014	ČRJ		1,398.00	36,347.00
	4/4/14	14832	\$J	10,494.00		46,841,00
	4/7/14	14839	8.J	3,180,00	4 000 00	50,021,00 45,653.00
	4/8/14	4/8/14	CRJ		4,368,00	38,977.00
	4/14/14	4/14/14	CRJ	5,00	6,676,00 5,00	38,977.00
	4/25/14	1012,1015	CRJ	00,0	B,718.00	30,259.00
	4/26/14	1012,1015	CRJ SJ	72.00	<b>-</b> 4	30,331.00
	5/2/14	14965 14966	SJ	354.00		30,605.00
	5/2/14 5/2/14	14967	ζέ	2,004.00		32,609.00
	5/2/14 5/2/14	14958	ŠJ	204.00		32,893.00
	5/2/14	14969	SJ	1,044.00		33,937.00
	5/2/14	14970	ខរ	3,030,00		36,967,00 37,015,00
	5/2/14	14971	\$J_	48.00	13,129.00	23,886,00
	5/2/14	1016	CKY		6,636.00	17,250,00
	5/2/14	5/2/14	ÇRJ	2,400,00	0,000.00	19,650.00
	5/14/14	16021	SJ	<u>کر-۱۵۵٬۵۵</u>	10,494,00	9,156.00
	5/16/14	5/15/14	CRJ CRJ	48.00	48.00	9,166.00
	5/19/14	B/19/14	ÇŔĴ	70100	2,400,00	6,756.00
	5/19/14	5/19/14 15078	SJ	72.00		6,828.00
	5/22/14 5/22/14	15079	รัม	9,654.00		16,482,00
	5/22/14	15080	s.i	2,454.40		18,936,40
	6/2/14	6/2/14	CRJ		6,756,00	12,180.40
	6/2/14	15122	\$J	126.00		12,306.40 16,819.33
	\$/2/14	15123	ខ្មា	3,512.93		19,441.50
	6/9/14	15152	<u>s</u> j	3,622.17		22,456.73
	6/20/14	10198	<u>81</u>	3,016,23 5,879.15		28,335.88
	6/20/14	15199	\$J	9 <sub>1</sub> 01a.10	2,454,40	25,881.48
	6/21/14	6/21/14	CRJ ÇRJ		72.00	25,809.48
	6/21/14	6/21/14 6/21/14	GRJ		9,664.00	16,155.48
	6/23/14 6/30/14	15230	ຮັ້ນ	2,880.69		19,042,17
	7/2/14	7/2/14	CRJ		3,812.93	15,529,24
	7/2/14	7/2/14	CRJ		126.00	15,403,24 20,498,41
	7/3/14	16236	\$J	\$,095. <b>17</b>	3,622.17	18,876.24
	7/8/14	7/2814	CRJ	600.00	SIVEGIII	17,476.24
	7/11/14	15268	ŝi	456.00		17,932.24
	7/11/14	15269	8.J 8.J	2,928.11		20,860.35
	7/11/14	15270 15298	8J	874.90		21,735.25
	7/18/14	15307	รี่งั	3,671.17		25,406.42
	7/18/14 7/18/14	15308	ร์มี	2,088,00		27,494.42
	7/18/14	15309	81	325,48	5 44 C 615	27,819.90 24,804.67
	7/21/14	7/21/14 1	CRJ		3,015.23	18,925.52
	7/21/14	7/21/14 2	CRJ	0.545.13	6,879.15	21,774.63
	7/22/14	15316	\$J	2,849,11		22,985,54
	7/23/14	16334	SJ CD (	1,210,91	2,886,69	20.098.85
	7/30/14	7/30/14	CRJ CRJ		5,095.17	45,003,68
	8/1/14	8-1 18987	9J	5,365,37	•	20,359.05
	8/1/14	15367 15404	83	2,866.60		23,224.73
	8/8/14 8/11/14	8/11/14	ĞŘJ	ğ.,	600.00	22,624.73
	8/11/14	8/11/14	ČRJ		456,00	22,169.73 19.240.62
	8/11/14	0/11/14	CRJ		2,928.11	18,365.72
	0/18/14	8/18/14 1	CRJ		874,90 3,671,17	14,604.65
	8718714	8/18/14 2	CRJ		2,080.00	12,600.56
	6/18/14	8/18/14/0	CRJ		326.48	12,281,07
	8710/148	<i>8/18/14 4</i>	CET		13840-113	**********

09/22/2015 3:58 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

**₩ 0003/0007** 

0/22/15 at 16:47:54,37

Page: 3

# CELESTE STEIN DESIGNS INC.

Customer Ledgers
For the Period From Jan 1, 2013 to Sep 30, 2015
Filter Critedia includes: 1) IDs from SCRUBSCO to SCRUBSCO. Report order to by ID. Report is printed in Detail Format.

8/22/14 8/26/14 8/29/14 8/29/14 9/2/14 9/8/14 9/18/14 9/23/14	8/22/14 2 8/26/14 1 16503 15505 9/2/14 1 9/8/14 1	CRJ CRJ SJ SJ CRJ	798,00	2,849,11 1,210.91	9,431.96
8/26/14 8/29/14 8/29/14 9/2/14 9/8/14 9/18/14 9/23/14	8/26/14 1 16503 15505 9/2/14 1	CRJ SJ SJ	798,00		
8/29/14 8/29/14 9/2/14 9/8/14 9/18/14 9/23/14	16503 15505 9/2/14 1	si si	798,00	1,210,01	8,221.05
8/29/14 9/2/14 9/8/14 9/18/14 9/23/14	15505 9/2/14 1	SJ	100100		9,019.05
9/2/14 9/8/14 9/18/14 9/23/14	9/2/14 1		12,527,62		21,546.67
9/8/14 9/18/14 9/23/14			12,021,02	5,355,37	16,191.30
9/18/14 9/23/14	WW 17 1	CRJ		2,865.68	13,325.62
9/23/14	15577	\$J.''	17,894,84	,	31,220.46
	16803	šj	7,951,98		39,172,41
9/23/14	15604	ŠĴ	840,00		39,812.41
9/23/14	16605	ŠĴ	5,796.00		45,608.41
9/25/14	15612	ŝĴ	3,511,81		49,120.22
9/25/14	16621	sj	6,784.09		84,904.31
9/26/14	15628	ŜĴ	2,421.69		57,326.00
9/29/14	9/29/14	CRJ	•	798.00	56,528.00
9/29/14	9/29/14	CRJ		12,527.62	44,000,38
10/6/14	16681	SJ	5,269.47		49,269.85
10/17/14	10/17/14	CRJ		7,951.95	41,317.90
10/17/14	15757	<b>\$</b> J	360.00		41,677.90
	15758	ŝJ	504.00		42,181.90
10/17/14	16759	SJ	5,169.89		47,351.79
10/22/14	1210	CRJ	G.00	6.00	47,361.79
	1210	ORJ		17,894,84	29,456.95
10/22/14	15773	9,1	240.00		29,696,95
10/22/14	15774	នរ	11,778.47	440.00	41,475.42
10/23/14	10/23/14	CRJ		U40,00	40,835.42
10/23/14	10/23	CHJ		5,796.00	36,039.42
10/27/14	10/27/14	CRJ		3,511.81	31,527.61 25,743.52
10/27/14	10/27	CRJ		5,784.00	23,321,83
	10-27-14	ÇR.J	45 540 54	2,421.69	35,570.44
	15856	\$J	12,248.61	6,269.47	30,300.97
11/7/14	11/7/14	CRJ		360.00	29,940.97
	11/17/14	CRJ		504.00	29,436.97
	11-17-14	CRJ		5,169.89	24,267.00
11/17/14	Nov 17,2014	21 21	2,214.00	17,100,00	26,481.08
11/20/14 11/20/14	16991 15992	SJ	6,200.26		32,681.34
11/24/14	11/24/14	CŔJ	0,200,00	240,00	32,441.34
11/24/14	11-24-14	CRJ		11,770,47	20,662.87
12/1/14	11/29/14	CRJ		12,248,61	0,414.26
12/12/14	16148	SJ	2,484.00	The part of the same	10,898.26
12/12/14	16149	SJ	3,822.00		14,720,26
12/12/14	16150	ຮົງ	9,696.29		24,416.55
12/31/14	12/31/14	ÇRJ	01000.00	6,200.26	18,216.29
1/2/15	1/2/15	ČRJ		2,214,00	16,002.29
1/16/16	1/16/15	CRJ		2,484.00	13,518.29
4/16/15	1/16/15	CRJ	i	3,822.00	9,696.29
1/20/15	1/20/15	CRJ		9,696,29	0.00
1/23/16	16332	8J	1,309.82		1,309.82
1/23/15	16334	ยป	1,188.00		2,497.82
1/23/16	16335	ŞJ	1,306,00		3,803.88
1/30/15	16357	ŚJ	13,499.15		17,303.03
2/23/15	2/26/15	CRJ		1,309,82	15,993.21
2/23/15	2/23/15	ÇIĞJ		1,188.00	14,805,21
2/23/15	2/23/15	CRJ		1,306.06	13,499.15
2/27/15	2/27/15	CRU		3,500.00	7,909.16
3/2/15	3/2/15	CRJ	e green to A	7,099.15	0.00
3/4/15	16618	5.1	1,698.00		1,698,00
3/4/16	16525	ŞJ	11,970,00		13,566,00
374745	16526	SJ	2,976,00		16,644,00 23,928,00
3/5/15	16528	84	7,284.00		24,640.00
3/20/15	16596	SJ SJ	720.00		31,326.00
3/20/15 3/27/16	16697 16618	8J 8J	6,678,00 20,832,00		52,158.00

09/22/2016 3:57 PM FAX 409 763 1084 CRLESTE STEIN DESIGNS

Ø 0006/0007

9/22/16 at 16:47:54.38

Pago: 4

## CELESTE STEIN DESIGNS INC. Customer Ledgers

For the Period From Jan 1, 2013 to Sep 30, 2015
Filler Critoria includin: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Roport is printed in Detail Formal.

Customer ID Customer	Date	Tráns No	Type	Debit Amt	Credit Anit	Bulance
AND A CONTRACTOR OF THE ACT OF	4/1/15	16643	SJ	4,014.00	*	56,172.00
	4/2/16	4/2/15	CRJ	1,011104	1,098.00	54,474.00
	4/2/15	4/2/15	ĞŔIJ		11,970,00	42,604.00
	4/2/16	4/02/16	CRJ		2,976,00	39,528.00
	4/6/15	4/8/15	ORJ		7,204,00	32,244.00
	4/13/15	18692	SJ	1,800.00	1144 1144	34,044,00
	4/13/15	16693	81	3,168.00		37,212.00
	4/21/15	4/21/15	ČRJ	9,100.00	720.00	36,492.00
	4/21/18	4-21-15	CRJ		6,678.00	29,814.00
	4/24/15	10749	SJ	822,00	0,0,0,00	30,636.00
	4/24/15	16750	27 32	558,00		31,194,00
			2 <u>1</u>	28,398.00		59,592.00
	4/24/15	16751		20,000,00	20,832.00	38,780.00
	4/27/15	4/27/15	CRJ SJ	1,392.00	£0,032,00	40,162.00
	4/29/15	16773				41,634.00
	4/29/15	16774	SJ	1,482.00		46,890,00
	4/29/18	16778	SI	5,256.00		52,116.00
	5/1/15	16791	SJ	5,228.00	4.04.4.00	
	5/1/15	5/1/15	CRJ		4,014,00	48,102.00
	5/13/15	5/813/15	CRJ		1,800.00	46,302.00
	5/13/15	5/13/15	CRJ	0.000.00	3,168.00	43, 134,00
	3/20/15	18869	81)	6,978.00	410124 MAIS	50,112.00
	5/22/15	5/22/15	CRJ		822.00	49,290.00
	5/22/15	5/22/15	ÇRJ		558.00	48,732.00
	5/22/15	5-22-15	CRJ		13,509.00	36,223.00
	5/22/15	16886	81	3,980.00		39,203.00
	5/22/15	16885	SJ	6,200,00		46,403.00
	5/26/15	5/28/15	CRJ		14,889,00	30,514.00
	5/29/15	5/29/16	CRJ		1,392,00	29,122.00
	6/29/15	5-29-15	CRJ		1,482,00	27,840.00
	5/29/15	5,29,15	CRJ		5,256.00	22,384.00
	5/29/15	5/29/15	CRJ		5,226.00	17,158.00
	5/29/15	16903	£3	1,638.00		18,796.00
	5/29/15	16904	SJ	23,580.00		42,376.00
	6/5/15	16938	SJ	810.00		43,186.00
	6/5/15	16939	SJ	22,062.00		65,248,00
	6/18/15	8/18/15	CRJ		6,978.00	58,270.00
	8/19/15	619scr	CRJ		6,200.00	52,070.00
	6/19/15	0619scrubsco2	ÇRJ		3,980.00	48,090.00
	6/26/15	6/25/15	ĊŖĴ		1,638.00	46,452.00
	6/30/15	6/29/15	ÇRJ		7,500.00	38,952.00
	6/30/15	1152	CRJ		3,000.00	35,952,00
	7/13/16	713SCRUBSC	CRJ		1,500.00	34,452,00
	7/27/15	1155	ČRJ		2,000,00	32,452.00
	8/27/16	DISPUTE-CHA	CRJ	7,500.00	•	39,952.00
	9/8/15	0908scrubsco	ČRJ	.	7,600.00	32,452,00
	9/8/15	1157	CRJ		1,000.00	31,452.00
port Total				535,146.24	503,694.24	31,452.00

PM FAX 409 703 1004 CELESTE STBIN DESIGNS	@ 0007/00 <b>0</b> 7
makery communication of the co	Address and Addres
address:	- Charles
Ship To: 536x Pin	e CAST,
West Chester, Of	4 4506
B, 11 10.	
8216 Prince ton 61	endale !
Box 199 West Chester OH 45069	1
- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
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	B.11 To.

## **UPS:** Tracking Information

Page 1 of 1



Proof of Dollvery

Close Window

Doer Customer,

Your notice serves as excel of delivery for the shipment listed below.

Trucking Number: Sprykke: 127263040348392840 UPS Ground 62,00 lbs

Wolght: Shippod/Billed On: Dollyered On:

Dolly fred Tv:

02.00 Ibb GN/D512016 GN/D512016 2:13 P.M. 3308 PINECASTLE CT WEST CHESTER, OH, US 45060 Mel Cuslomal Words!

WEST CHE

Thank you for giving un this appointmity to serve you.

Şincərəiy, LIPS

Tracking to sults provided by UPS: 07/16/2015 12:28 P.M. ET

Paol This Page

Сіодо Міциру



24.5/2016

## **UPS: Tracking Information**

Page 1 of 1

**Proof of Dalivery** 

Cipsoly/madox

Dear Gustomer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Numbers

12/283040348228988

Service: Weight:

UPS Ground 27.00 lbs

Shipped(Silled On: Delivered On; Delivered Yo;

27.00 toll Doliszo16 Di14 P.M. 5388 PINECASTLE CT WEST CHESTER, OH, US 45080 Porch

Lon Atı

Thank you for giving us this apportunity to some you.

Sincerely,

Tracking results provided by UPS: 07/18/2015 12:33 P.M. ET

Print Tals Page

Close Window

#### Renee Rochkind

From:

Renee Rochkind

Sent:

Friday, July 10, 2015 3:39 PM from landrith; Gutieful 4U

To: Cc:

Celeste Stein; Dorl Golan; 'alton@acilaw.com'

Subject:

RE: Past Due Invoices

No it would not help but thank you for the ofer.

You are under the impression that we discontinued doing business with you. We are not shipping at this time because of your outstanding balance on past due invoices totalling \$34,452.00. This has caused a serious breakdown in our business relationship. Distributors are expected to pay on time. Since this is not happening you have lost your distributorship. Please retain an attorney in Texas. The law firm of Alton Todd will be in touch.

Renée Rochkind

From: torn landrith [mailto:tomlandrith@gmail.com]

Sent: Friday, July 10, 2015 1:38 PM

To: Cutieful 4U

Cc: Renee Rochkind; Celeste Stein; Dori Golan

Subject: Re: Past Due Invoices

Rence,

If it would help we can return some inventory to help offset our outstanding debt?

Tom:

On Fri, Jul 10, 2015 at 2;34 PM, Cuticful 4U <a href="euticful/4u@gmail.com">euticful/4u@gmail.com</a> wrote: Hello All.

Your decision to discontinue our business relationship has caused us to have serious financial issues in the short term. We will continue to make payments on a weekly basis. If you choose to use legal representation we will work directly with him or her.

Tont

On Fri, Jul 10, 2015 at 1:28 PM, Reneo Rochkind < Renec Rochkind@eclestestein.com > wrote:

Tom,

A check was received today for \$1,500,00. This is not acceptable.

The invoices listed below will need to be paid in full by Monday, July 13, 2015. If we do not receive it will be turned over to a lawyer.

ŧ

07/18/2015 1:37 PM PAX 409 Y63 1054

s ron anonn bi

CEPTERAL RAPID DEPTEND

Inv. 16904 \$11,580.00

Inv. 16938 \$ 810.00

Inv. 16939 \$22,062.00

TOTAL \$34,452.00

Rence Rochkind

Collections

Cuticful Distribution
pic. 513-892-9265
Cas 513-874-5486
cuticful4u@gmail.com
www.cuticful4U.com

Tom Landrith
Cutiefid Distribution

Independent Rep for Barco Uniforms

cell: 513-238-7190 fax: 513-874-5486 tomlandrith@gmail.com



# **Cutieful Distribution**

8216 Princeton-Glendale Road Box 199

West Chester, OH 45069

Tel: (513)892-9265

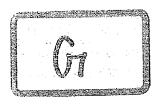
Fax: (513)874-5486

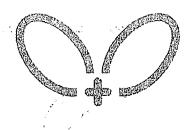
cutieful4u.com

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# Price List Effective October 15, 2015

Cutieful Compression Socks 0815 MM HG	All Designs	\$ 6.50	EA
Purse Key Finders	All Designs	\$ 3.95	EA
Pepper Spray			
	Spitfire	\$ 8.99	EA
	Hard Case	\$ 5.99	EA
	Lipstick	\$ 5.99	EA
	Runner	\$ 5.99	EA
	Camo	\$ 5.99	EA
	Floral Designer	\$ 5.99	EA





# cutieful

# 90 We're Back!

New catalog, new designs, new packaging. Enclosed you will find our new catalog and order form.

Hope you like it!

Special Sale

Buy 36 Pieces

(Finders Key Purse and Pepper spray included)

**SAVE 10%** 

Write SALE on the top of the order form and we will take care of the rest.

Thank you for your past support.

We look forward to working with you in the future.

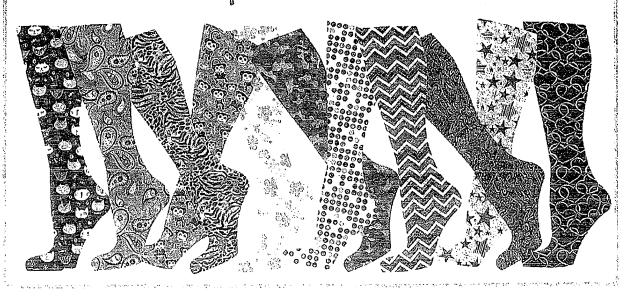


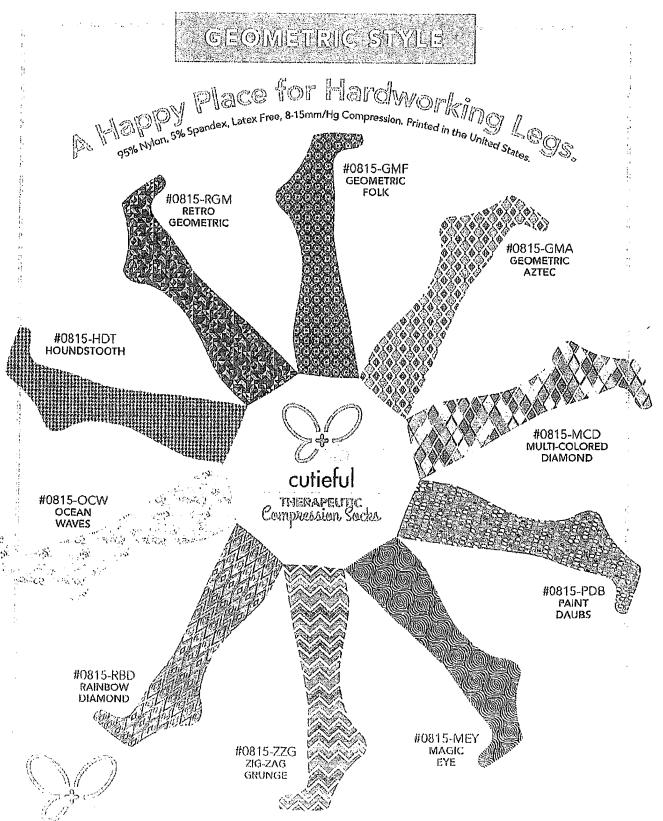
Cutleful Distribution & 8216 Princeton-Glendale & Box 199 & West Chester, OH 45069 www.cutieful4u.com & phone: 513.892,9265 & fax: 513.874,5486 & email: cutieful4u@gmail.com



# cutieful

THERAPEUTIC Compression Socks





Cutieful Distribution 

8216 Princeton-Glondale 

Box 199 

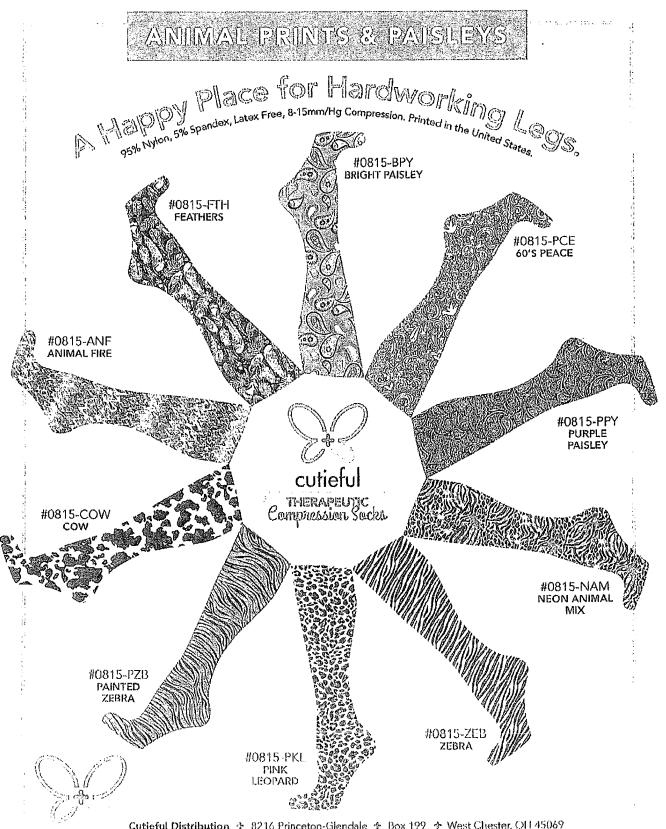
West Chester, OH 45069

www.cutieful4u.com 

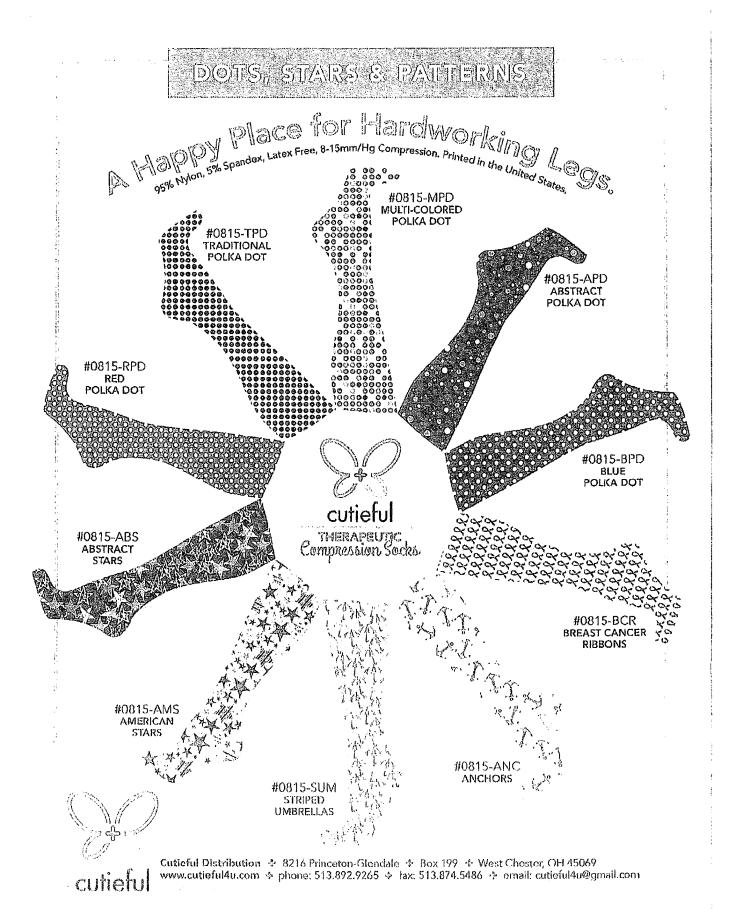
phone: 513.892.9265 

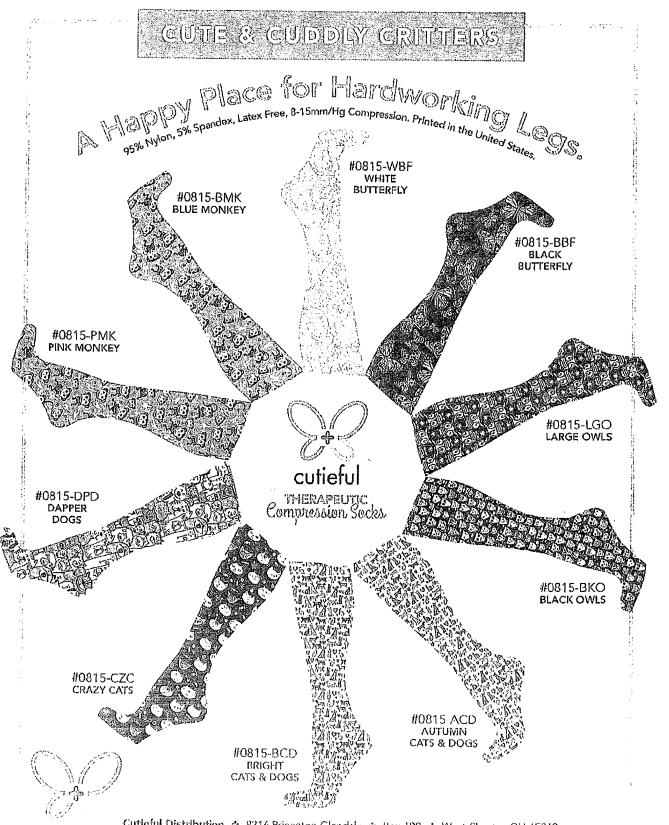
fax: 513.874.5486 

mail: cutieful4u@gmail.com



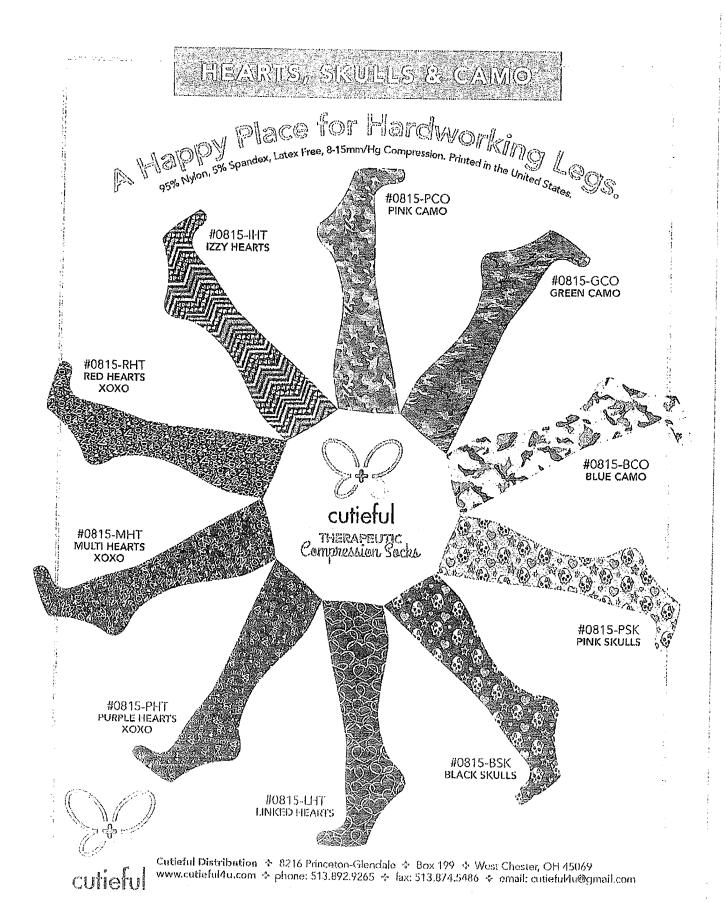
Cutieful Distribution → 8216 Princeton-Glendale → Box 199 → West Chester, OH 45069 www.cutieful4u.com → phone: 513.892,9265 → tax: 513.874.5486 → email: cutieful4u@gmail.com

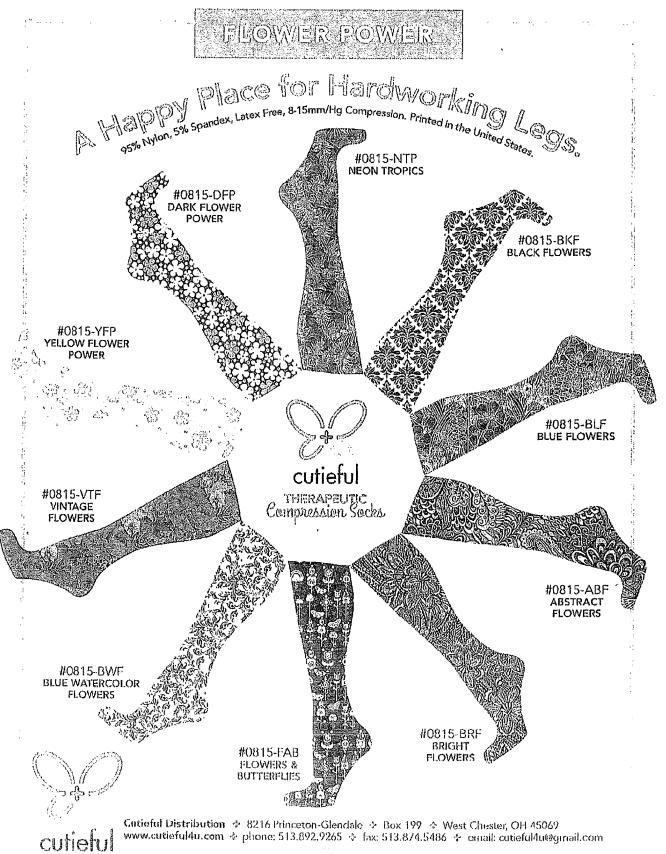




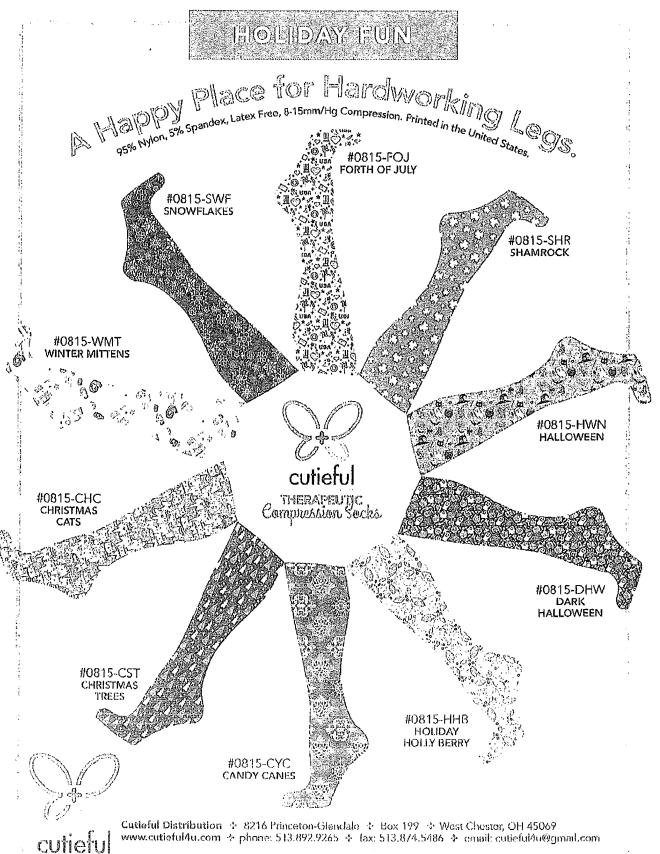
Cutieful Distribution ◆ 8216 Princeton-Glandale ◆ Box 199 ◆ West Chester, OH 45069 www.cutioful4u.com ◆ phone: 513.892.9265 ◆ fax: 513.874.5486 ◆ omail: cutieful4u@gmail.com

cutieful





Cutieful Distribution № 8216 Princeton-Glendalo ❖ Box 199 ❖ West Chester, OH 45069 www.cutieful4u.com ❖ phone: 513.892,9265 ❖ fax: 513.874.5486 ❖ cmail: cutieful4u@gmail.com



Cutieful Distribution → 8216 Princeton-Glendale → Box 199 → West Chester, OH 45069 www.cutieful4u.com → phone: 513.892.9265 → fax: 513.874.5486 → email: cutieful4u@gmail.com

<u>Notice</u>: If this case is filed as an expedited action pursuant to Rule 169 of the Texas Rules of Civil Procedure, please contact the Court to advise of the same as soon as possible

## THE DISTRICT COURTS OF GALVESTON COUNTY CIVIL CASE INFORMATION STATEMENT

The case Information Statement is for administrative purposes only. It shall be filed with the Parties		
Original Pleadings and shall be served upon all other parties to the action. All Status Conferences will		
be set for Thursdays following 90 days from the date of filing according to each Courts scheduled times		
10th District Court - 9:00 A.M.	212th District Court – 9:00 A.M.	
56th District Court - 9:30 A.M.	405th District Court - 10:00 A.M.	
122 <sup>nd</sup> District Court – 9:30 A.M.		

Notice of Status Conference Setting: Please calendar this event Date: 01/28/2016 set in the 405th District Court District Court

Case Number: 15-CV-1174				
Case Style: Celeste Stein Des		ubsco, Ltd., Et A	Al	
Case Type: Other Civil - Cas	ses			
Name of Primary Attorney filing	this form	Name of Oppos	ing Attorney, if known	
Attorney Name		Attorney Name	Ali	
Attorney Bar No.		Attorney Bar No.		
Attorney Address		Attorney Address	5	
Attorney Phone No		Attorney Phone	No	
Attorney Fax No.		Attorney Fax No	),	
Briefly describe the case, including accelerated disposition. If discovery LEVEL 3 is requested,	•	-	·	
Estimated time for discovery		Estimated trial time		
Do you presently anticipate adding any parties?		If so when?		
Level Assignment Preferred: (ple	ease check one)			
Level 1	Level 2		Level 3	
\$50,000 or less	All Other Cases		Court Order Only	
Is this case suitable for ADR? (yes	or no)	ADR	Method?	
Signature of Attorney		Adolarantiketranomajak, www.decorete.uk		
Printed Name of Attorney:			signed	

**405th District Court of GALVESTON County. Texas** 722 MOODY 6TH FLOOR GALVESTON TX 77550

Case #: 15-CV-1174

CELESTE STEIN DESIGNS, INC.

Plaistiff

vs

SCRUBSO LTD., AND THOMAS LANDRITH

Defendant

#### AFFIDAVIT OF SERVICE

	(Private Process)
this action. That I	
That I delivered to the following	: Scrubsco LTD by Serving Thomas Landrich : CITATION; PLAINTIFF'S ORIGINAL PETITION; CIVIL CASE INFORMATION STATEMENT
at this address	: 5368 Pine Cystle CT West choser, oh 45069
Manner of Delivery	<ul> <li>: [✓] by PERSONALLY delivering the document(s) to the person above.</li> <li>[☑] by SUBSTITUTE SERVICE per Order by delivering to the above name person at the usual place of abode/business</li> <li>[☑] by POSTING per Order by securely affixing to the main entry</li> </ul>
Date and time	: 17(1/12 - 1,00 bar
paper are true to the EXECUTED BY:    Date	signature of Server Lic#:  Expiration:  appeared before me, a notary public, and e stated that he/she has personal knowledge of the facts set g affidavit and declared that the facts contained therein are wen my hand and seal of office this of the facts.
PCP Inv. #A15B06991 Private Process Serve	r NOTARY PUBLIC
Todd, Alton C. The Law Firm Of Alton  christyb	Service Fee: Witness Fee: Mileage Fee: E-FILE AFF
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#### CASE NO. 15-CV-1174

CELESTE STEIN DESIGNS, INC.,	§	IN THE DISTRICT COURTS OF
	§	
Plaintiff,	§	
	§	
VS.	§	GALVESTON COUNTY, TEXAS
	§	
SCRUBSCO, LTD. and	§	
THOMAS LANDRITH,	§	
	§	
Defendants.	8	405 <sup>th</sup> DISTRICT COURT

#### DEFENDANT SCRUBSCO, LTD'S ORIGINAL ANSWER

Defendant Scrubsco, Ltd. ("Defendant"), for its Original Answer to the Petition filed against it by Plaintiff, Celeste Stein Designs, Inc. ("Plaintiff"), respectfully states as follows:

#### A. GENERAL DENIAL

Pursuant to Tex. R. Civ. P. 92, Defendant generally denies the allegations contained in the Plaintiff's Petition.

#### B. VERIFIED DENIALS

There is a defect in parties as Defendant Thomas Landrith was, at all times, acting as a representative of Defendant Scrubsco, Ltd. and is therefore not liable in the capacity in which he is sued.

The account Plaintiff has sued upon is not as alleged by the Plaintiff because the Defendant was a distributor, not a mere purchaser of Plaintiff's goods.

#### C. AFFIRMATIVE DEFENSES

For further defense, if any is necessary, Defendant alleges as follows:

- 1. Plaintiff is estopped from pursuing its claims.
- 2. Plaintiff has unclean hands.
- 3. Plaintiff has failed to mitigate its alleged damages.
- 4. The amount Plaintiff has sued for is improperly alleged and improperly calculated.
- 5. The Plaintiff has failed to account for all credits and offsets.
- 6. The Plaintiff has acted in bad faith.

#### D. CONCLUSION

For the foregoing reasons, Defendant Scrubsco, Ltd. respectfully requests that, after hearing and trial, Plaintiff's claims be denied in their entirety and that Defendant be awarded its reasonable and necessary attorneys' fees incurred in defense of Plaintiff's claims.

Respectfully submitted,

#### RENSHAW NORWOOD, PLLC

/s/ Justin W. R. Renshaw

Justin W. R. Renshaw Texas Bar No. 24013392 2900 Weslayan, Suite 230 Houston, Texas 77027 (713) 400-9001 (direct) (713) 400-9006 (fax) justin@renshaw-norwood.com

Attorneys for Defendants, Scrubsco, Ltd. and Thomas Landrith

#### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing on all counsel of record by electronic service, email, fax, and/or U.S. Mail on this 28<sup>th</sup> day of December, 2015:

Alton C. Todd The Law Firm of Alton C. Todd 312 S. Friendswood Drive Friendswood, Texas 77546 (281) 992-8633 (281) 648-8633 (fax)

/s/ Justin W. R. Renshaw

## UNSWORN DECLARATION PURSUANT TO TEX. CIV. PRAC. & REM §132.001

My name is Thomas Landrith. My date of birth is, 1	9
and my address is 5368 Pinecastle Ct., West Chester, Ohio 45069. I declare u	ınder
penalty of perjury that the facts contained in the foregoing Answer to Plaintiff's Per	tition
are true and correct.	
Executed in Butler County, State of Ohio, on this day of December, 20	)15.
Thomas Landrith	

## UNSWORN DECLARATION PURSUANT TO TEX. CIV. PRAC. & REM §132.001

My name is Thomas Landrith. My date of birth is June 1, 1963
and my address is 5368 Pinecastle Ct., West Chester, Ohio 45069. I declare under penalty of perjury that the facts contained in the foregoing Answer to Plaintiff's Petition are true and correct.
Executed in Butler County, State of Ohio, on this 27 day of December, 2015.
1/1/
Thomas Landrith

Galveston County, Texas Envelope No. 12796896 By: Lisa Kelly 9/20/2016 1:18:55 PM

#### NO. 15-CV-1174

CELESTE STEIN DESIGNS, INC.	§	IN THE DISTRICT COURT OF
PLAINTIFF,	S	
	§	
vs.	S	GALVESTON COUNTY, TEXAS
	§	
SCRUBSCO LTD., and	S	
THOMAS LANDRITH	§	
DEFENDANTS.	S	405th JUDICIAL DISTRICT COURT

#### PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW PLAINTIFF CELESTE STEIN DESIGNS, INC., (hereinafter "Plaintiff Stein Designs") complaining of Defendants, SCRUBSCO, LTD. (hereinafter "Defendant SCRUBSCO") and THOMAS LANDRITH (hereinafter "Defendant Landrith"), in the course of his employment, and for causes of action respectfully shows the Court the following:

#### DISCOVERY CONTROL PLAN

1. Pursuant to Tex. R. Civ. P. 190.1, Plaintiff intends to conduct discovery under Rule 190.3, Level 2.

#### **PARTIES**

2. Plaintiff, CELESTE STEIN DESIGNS, INC., is a domestic corporation and doing business at 7801 Bayside Avenue, Galveston, TX, 77554.

- 3. Defendant, SCRUBSCO, LTD., is a foreign limited liability company, duly organized and existing by virtues of the laws of the State of Ohio, doing business in the State of Texas, and has been served with process and filed an answer herein.
- 4. Defendant, THOMAS LANDRITH, is a resident of the State of Ohio, and he may be served with citation and has been served with process and filed an answer herein.

#### **Jurisdiction & Venue**

- 5. The present Court has personal jurisdiction over the Plaintiff, STEIN DESIGNS, as it is a citizen of Texas with its principal place of business in Texas and Defendant SCRUBSCO and Defendant LANDRITH, in his individual capacity and in the course of his employment, both have minimum contacts with the State of Texas. The Court has subject matter jurisdiction as the amount in controversy is within the limits of the Court, and no other court has exclusive jurisdiction in that Plaintiff, STEIN DESIGNS, sues for total damages less than \$75,000.
- 6. Venue is proper in the present forum as this cause of action accrued in whole or in substantial part, in Galveston County, Texas, pursuant to Tex. Civ. Prac. & Rem. Code § 15.002.

#### Request Pursuant To Rule 28

7. To the extent that Defendant SCRUBSCO is conducting business pursuant to a trade name or assumed name not listed as a named party to this suit, then suit is

brought against Defendant SCRUBSCO and, pursuant to the terms of Rule 28 of the Texas Rules of Civil Procedure, Plaintiff hereby demands that upon answer to this suit, Defendant SCRUBSCO answer in its correct legal and assumed names.

#### Factual Background

8. This suit is brought as an open account for the sale of goods and merchandise. As shown in the itemized and verified account attached hereto and on the dates evidenced in past invoices, Plaintiff STEIN DESIGNS sold goods to Defendant SCRUBSCO on a contract for an open account in the regular course of business. The names used on the account were those of Defendant, SCRUBSCO in their business enterprise. Defendant SCRUBSCO received and accepted the goods. (See attached Exhibit "E," Proof of Delivery). Upon acceptance, Defendant SCRUBSCO promised to and became bound to pay the agreed prices, as specifically shown in the past invoices. Defendant SCRUBSCO has yet to pay the amount due and owing of \$34, 452.00. (See Exhibit "A," Aged Receivables As of September 30, 2015). Plaintiff STEIN DESIGNS sent two letter demanding payment on past due invoices on July 28, 2015 and August 12, 2015, attached as Exhibit "B." The price for the goods accepted by Defendant SCRUBSCO were reasonable, fair and itemized in the invoices reflecting a request for payment. (See Celeste Stein Designs, Inc. itemized invoices, purchase orders, and outstanding Scrubsco Invoices attached as Exhibit "C"). Statements requesting payment were sent to Defendant SCRUBSCO and systematic records of the debt have been kept by Plaintiff STEIN DESIGNS, INC. (See Celeste Stein Designs, Inc.'s Customer Ledgers for SCRUBSCO, attached as Exhibit "D").

- 9. Plaintiff STEIN DESIGNS has "designed and manufactured over 2 million pairs of printed socks, tights, and leggings." *See* www.celestestein.com/About. Plaintiff STEIN DESIGNS is one of the "leading manufacturers of printed hosiery" and is "internationally recognized for [their] design and production capabilities." *Id.* Specifically, Plaintiff STEIN DESIGNS designs and manufactures printed compression socks. In connection with its business activities, Plaintiff STEIN DESIGNS has innovatively developed its own compression socks, and its own patterns. Plaintiff STEIN DESIGNS manufactures, markets, and sells these compression socks to customers and potential customers, including Defendant SCRUBSCO. Further, Plaintiff STEIN DESIGNS has created and developed these compression socks and patterns at a substantial expense and burden. Defendant SCRUBSCO maintained an open account with Plaintiff STEIN DESIGNS and purchased several pattern compression socks over time. (Exhibit C).
- 10. In July of 2015, Defendant SCRUBSCO had a significant outstanding balance that was past due on that account. (Exhibit B and Exhibit C). Plaintiff STEIN DESIGNS notified Defendant SCRUBSCO of the stopped shipping of products until the outstanding balance was rightfully paid (See Exhibit "F"). In October, 2015, Defendant SCRUBSCO, with a significant balance still owed to Plaintiff STEIN DESIGNS, released a catalog by "Cutieful Distributions" "by SCRUBSCO," (catalog attached as Exhibit "G") that contained and marketed "Cutieful" compression socks as well as patterns exactly as those innovatively designed and manufactured by Plaintiff STEIN DESIGNS. See http://www.mysockspot.com/aboutus.asp.

- 11. Defendant SCRUBSCO obtained these compression sock designs and patterns through improper means and under circumstances giving rise to a duty not to disseminate the trade secret without Plaintiff STEIN DESIGNS' permission.
- 12. Since obtaining and disseminating Plaintiff STEIN DESIGNS' innovative pattern designs and compression socks, Defendant SCRUBSCO has used them for purposes of marketing and selling those same designs for independent economic profit. Defendant SCRUBSCO is using Plaintiff STEIN DESIGNS' established designs to compete directly with Plaintiff STEIN DESIGNS in the same business industry. Plaintiff STEIN DESIGNS has incurred significant damages as a result of Defendant, SCRUBSCO'S, misappropriation and illegal use of Plaintiff STEIN DESIGNS'S compression socks and patterns.

### FACTS COMMON TO CLAIMS OF UNFAIR COMPETITION, TRADEMARK INFRINGEMENT, AND TRADE DRESS

- 13. As stated above, Plaintiff STEIN DESIGNS has innovative pattern designs for its compression socks. Among the several designs, there are "best-sellers."
- 14. Plaintiff STEIN DESIGNS created an innovative knit technique for the 8-15 compression sock called "tubular thin graduated" "therapeutic" compression socks. The heel of the sock is in the shape of a tube rather than a square ("heel to toe"). Plaintiff STEIN DESIGNS named this particular sock using the word "therapeutic" compression sock, and it has been on the market since early 2012 and has been the only one on the market with this knit technique/formation associated with the word "therapeutic." Plaintiff has also

had other types of compression socks with various patterns. During this time, a business relationship with Defendant SCRUBSCO, as distributor, existed.

- 15. Defendant SCRUBSCO had a prior business relationship with Plaintiff STEIN DESIGNS. Defendant SCRUBSCO was a distributor of Plaintiff STEIN DESIGNS products to sales representatives within the industry. The business relationship ended on July 10, 2015 when Defendant SCRUBSCO, due and owing tens of thousands of dollars to Plaintiff STEIN DESIGNS, lost its distributorship due to the outstanding balance owed to Plaintiff STEIN DESIGNS (*See Exhibit F* ).
- 15. Once the distributorship with Plaintiff STEIN DESIGNS ended, Plaintiff STEIN DESIGNS was notified of a flyer circulated by Defendant SCRUBSCO within the industry to sales representatives. The flyer, attached as Exhibit H, shows Defendant SCRUBSCO advertising by the name of "Cutieful" with a butterfly logo and the wording "DISTRIBUTORS OF COMPRESSION SOCKS...." It also blatantly shows PLAINTIFF STEIN DESIGNS' crown logo in the bottom corner of the flyer. This representation of association, affiliation, endorsement, or connection to Plaintiff in any way was not approved by Plaintiff STEIN DESIGNS.
- 16. Conveniently, with the business relationship at an end and Defendant SCRUBSCO, due and owing Plaintiff STEIN DESIGNS \$34,452.00, Defendant SCRUBSCO released a catalog and started its own line of "therapeutic" tubular thin graduated compression socks, and other compression socks with patterns strikingly similar to those

of the best sellers it had when it was the distributor of Plaintiff STEIN DESIGNS' patterns and compression socks. Defendant SCRUBSCO began manufacturing and packaging these socks in almost identical packaging and placed them in the marketplace for sale.

- 17. Plaintiff STEIN DESIGNS and Defendant SCRUBSCO market and sell compression sock products to a similar community of buyers, including sales representatives and representatives at national trade shows that may buy the items in bulk. The marketing techniques and the compression sock products of Plaintiff STEIN DESIGNS flow through particular industry channels of sale. In order to sell the products, manufacturers such as your Plaintiff attend national trade shows and have their products sold in stores. Plaintiff STEIN DESIGNS has been attending these trade shows for years and built a well known reputation and goodwill within the compression sock industry of buyers, distributors and sales representatives alike.
- 18. The packaging and marketing techniques of Defendant SCRUBSCO are remarkably similar to those of Plaintiff STEIN DESIGNS.
- 18. Plaintiff STEIN DESIGNS has been openly marketing its compression socks to buyers with a radial ad design since 2013. (See Exhibit I). Once the distributorship ended between the parties and Defendant SCRUBSCO began to market and sell its own line of socks to the same community of buyers through the same channels of the industry, Defendant SCRUBSCO conveniently used the same exact style of marketing ad: the radial ad design used by Plaintiff STEIN DESIGNS. (Compare Exhibit I to Exhibit J). It showcases

the sock designs in a radial fashion. The radial is formed by several consecutive depictions of compression socks. Plaintiff STEIN DESIGNS has its crown logo at the center of the circular ad. Compare this with the butterfly logo of Defendant SCRUBSCO at the center of its circular ad.

19. Defendant SCRUBSCO, as a prior business distributor of Plaintiff STEIN DESIGNS' compression socks, was informed of Plaintiff STEIN DESIGNS' packaging of its well-known "therapeutic" compression socks and other compression socks with almost identical patterns within the industry. Not only was Defendant aware of Plaintiff STEIN DESIGNS' packaging, it was also previously associated with Plaintiff STEIN DESIGNS as to these particular products in a business relationship and once that relationship ended continued to associate with your Plaintiff. (See Exhibit H). When Defendant SCRUBSCO released its own line of tubular thin graduated 8-15 compression socks, of lesser quality, and other compression socks of similar patterns to your Plaintiff and of lesser quality, it conveniently had the same packaging, including the same underlying design template for its packaging, the wording and labeling. The white packaging at the top of the product is the same size and has nearly identical wording. The next part of the Defendant SCRUBSCO'S packaging has a thick white material binding the sock together that is the same size, color, template and shape of your Plaintiff's. (See Exhibit K). On the back of the product, Plaintiff STEIN DESIGNS has a very distinct means of wrapping the packaging of the sock where there is a circular form of closure to hold the pair of socks together. The packaging is wrapped at the same place and in the same exact way by Defendant SCRUBSCO. It also has a very similar template, especially for "wear instructions," where there is a block of color with white type print to showcase the instructions. Plaintiff STEIN DESIGNS uses pink font at the top of the packaging with a pink block for Wear Instructions. Defendant SCRUBSCO uses blue font at the top of the packaging with a blue block for Wear Instructions. (See Exhibit L).

20. On the front of the packaging, is Defendant SCRUBSCO'S logo and also the word "therapeutic." Compare the two packaged products with similar packaging elements and placements of graphics, including the word "therapeutic," in Exhibit K. Since the launch of this particular compression sock in early 2012, Plaintiff STEIN DESIGNS has and is the only one to use this word when marketing compression socks for non-medical use. Plaintiff did not approve Defendant SCRUBSCO'S use of its word and unregistered mark, "therapeutic." Knowing the strength of the unregistered mark in the compression sock community through its prior business relationship as a distributor for Plaintiff STEIN DESIGNS, Defendant SCRUBSCO intended to use the same packaging template, placement of graphics and wording, and elements widely used for years by Plaintiff STEIN DESIGNS. Defendant SCRUBSCO intended to capitalize on Plaintiff STEIN DESIGNS' well-known reputation in the compression sock industry and its goodwill with other distributors, sales representatives and purchasers by manipulating its prior business relationship with your Plaintiff.

21. Instead of paying the owed amount to Plaintiff STEIN DESIGNS which ultimately led to the termination of Defendant SCRUBSCO's title as distributor for your Plaintiff, Defendant SCRUBSCO launched its own line of "therapeutic" compression socks and other compression socks mimicking the line of its prior business partner and manufacturer, Plaintiff STEIN DESIGNS. Further, instead of creating its own product, packaging technique, design, patterns, ads and marketing techniques, Defendant SCRUBSCO intentionally chose to adopt those owned by one of its prior holders of distributorship, Plaintiff STEIN DESIGNS. Defendant SCRUBSCO, as a prior distributor of your Plaintiff, imitated a line including packaging and patterns that is confusingly similar to Plaintiff STEIN DESIGNS' line that has been widely recognized nationally in the compression sock industry since early 2012 and before.

#### Liability for the Debt

13. Plaintiff STEIN DESIGNS made proper demand, on July 28, 2015 and August 12, 2015, for payment on past due and owing invoices for the sale of goods to Defendant SCRUBSCO. Defendant SCRUBSCO has failed to pay the account balance due of \$34,452.00. All proper credits due to Defendant SCRUBSCO, if any, have been properly made. Defendant SCRUBSCO'S failure to comply with the demand for payment that is due and owing causes Defendant SCRUBSCO to be liable on this debt.

#### Attorney's Fees

14. The failure of Defendant SCRUBSCO to pay the account balance owed to Plaintiff STEIN DESIGNS. has made it necessary for Plaintiff STEIN DESIGNS to employ

the undersigned attorney to sue on the account. The claim for payment was presented to Defendant SCRUBSCO more than thirty (30) days prior to the filing of this suit and remains unsatisfied. *See* Exhibit "A" (demand letters) and Exhibit "B" (aged receivables). Plaintiff STEIN DESIGNS is entitled to recover reasonable and necessary attorney's fees.

#### Liability for Misappropriation of Trade Secrets

- 15. Plaintiff STEIN DESIGNS was at all times material to this litigation the owner of trade secrets involving the compression socks themselves and the creative, innovative design and/or pattern, manufacturing and marketing of pattern compression socks.
- 16. Defendant SCRUBSCO improperly acquired the compression sock process and patterns designed by Plaintiff STEIN DESIGNS and misappropriated them to its own use by adopting the compression sock and its patterns of Plaintiff STEIN DESIGNS and using it to create a new product under Defendant SCRUBSCO'S business name and market the products in an October 2015 catalog for independent economic profit and in direct competition with Plaintiff STEIN DESIGNS.
- 17. Plaintiff STEIN DESIGNS incurred substantial damages as a direct and proximate result of Defendant SCRUBSCO'S illegal use of Plaintiff STEIN DESIGNS' compression socks and unique compression sock patterns manufactured for sale nationwide. Further, this misrepresentation and misappropriation is wilful and malicious because Defendant SCRUBSCO has a past due balance with Plaintiff STEIN DESIGNS, including for the sale of compression socks, (Exhibit A, B and C).

#### Damages for Misappropriation of Trade Secrets

18. As a result of Defendant SCRUBSCOS misappropriation of trade secrets through illegal use, Plaintiff STEIN DESIGNS has suffered actual and consequential damages in the form of lost profits and lost sales in an amount less than the minimum jurisdictional limit of this Court but not more than \$75,000. Defendant SCRUBSCO'S conduct of stealing Plaintiff STEIN DESIGNS' unique compression sock process and patterns and using them to obtain independent economic profit was committed intentionally, knowingly, and with disregard of Plaintiff STEIN DESIGNS' rights, thus Plaintiff STEIN DESIGNS is entitled to exemplary damages in an amount not less than the maximum amount permitted by applicable law but not more than \$75,000. As a result of releasing an October 2015 catalog marketing for sale the same style of unique compression socks and designs of Plaintiff STEIN DESIGNS, the Defendant SCRUBSCO used actual misappropriation to gain commercial advantage. Plaintiff STEIN DESIGNS requests permanent injunctive relief under Tex. Civ. Prac. & Rem. Code 134A.003.

#### **Prejudgment Interest for Misappropriation of Trade Secrets**

19. In addition to the above and foregoing allegations, Plaintiff STEIN DESIGNS further pleads its entitlement to prejudgment interest at the highest rate allowed by Texas law.

#### State and Common Law Unfair Competition Claims

20. Plaintiff STEIN DESIGNS incorporates the preceding paragraphs herein.

- 21. Plaintiff STEIN DESIGNS has consistently used the packaging, packaging design template and color fills, labeling and wording, including "therapeutic," and marketing techniques such as the radial ad since early 2012 in connection with 8-15' compression socks. *See Exhibits K, L*. This packaging in combination with the use of the word "therapeutic" and use of radial ads industry wide to buyers, including but not limited to sales representatives, is distinctive of Plaintiff STEIN DESIGNS well-known compression sock business.
- 22. Since 2015, Defendant SCRUBSCO has failed to pay the account balance due of \$34,452.00 for the purchase of compression socks from Plaintiff STEIN DESIGNS. After the failure of payment to your Plaintiff and also since 2015, Defendant SCRUBSCO created and has been using a confusingly similar packaging on its compression socks, a confusingly similar design template for the packaging, confusingly similar wording, including but not limited to the word "therapeutic" on its packaging to the same industry of buyers. Defendant SCRUBSCO knew of Plaintiff STEIN DESIGNS' marks based on its previous lengthy distributorship with your Plaintiff. Defendant SCRUBSCO, known to the public of compression sock buyers as a long time business affiliate and distributor of Plaintiff STEIN DESIGNS, intended to fraudulently deceive the public into believing the compression socks sold by Defendant SCRUBSCO were actually those of Plaintiff STEIN DESIGNS, as the source, or that Plaintiff STEIN DESIGNS sponsored, endorsed, or was affiliated in connection with Defendant SCRUBSCO'S use of the marks for the goods and services. See Exhibits K, L and H.

- 23. Defendant SCRUBSCO willfully adopted the packaging, word, and use of marketing techniques on the compression sock product and these activities constitute unfair competition under Tex. Bus. & Comm. Code Section 16.29 and State of Texas common law, unjust enrichment and passing off. Further, the continued use of these marks creates a likelihood of confusion to the public of compression sock buyers. These buyers will be confused through this deceit and Defendant SCRUBSCO will profit from the hard earned goodwill and reputation of Plaintiff STEIN DESIGNS.
- 24. The second element of unfair competition as it relates to Plaintiff STEIN DESIGNS is the innovative patterns printed onto the compression socks. Plaintiff STEIN DESIGNS has innovatively designed several sock patterns to sell to the public. Many of these patterns have been sold for years, including "best sellers" sold by Defendant SCRUBSCO as distributor for Plaintiff STEIN DESIGNS in the past. For example, the "doggie" pattern as shown in *Exhibit P*, attached, is directly from Plaintiff STEIN DESIGNS website and has been sold for at least a decade. Further, Plaintiff STEIN DESIGNS has an agreement with a breast cancer organization for a portion of proceeds from sales of a specific design by Plaintiff STEIN DESIGNS, shown in *Exhibit Q*, to go back to that organization.
- 25. This combination of pattern features creates a comprehensive, industry wide trade dress image to buyers, including but not limited to sales representatives. This element of trade dress is known industry wide to the material groups of compression sock buyers and the public and has been associated with Plaintiff STEIN DESIGNS' business for years.

The inclusive pattern features referenced above are distinctive and unique of Plaintiff STEIN DESIGNS' as a business. Additionally, these printed patterns and designs, including design template have been associated with Plaintiff STEIN DESIGNS' business as the source of the compression sock product consistently over the years. In totality, this overall combination of patterns directly identify in connection with the well-known business of Plaintiff STEIN DESIGNS, not just the compression sock for purchase. *See Exhibits K, L, and H, See www.celestestein.com*.

26. Since 2015, Defendant SCRUBSCO has failed to pay the account balance due of \$34,452.00 for the purchase of compression socks from Plaintiff STEIN DESIGNS. After the failure of payment to your Plaintiff and also since 2015, Defendant SCRUBSCO created and has not only been using and selling confusingly similar patterns to that of Plaintiff STEIN DESIGNS, but has also been selling, profiting from, and passing off the same exact patterns of Plaintiff STEIN DESIGNS just under its own name. See Exhibit L, P, Q, and R compared to Exhibit S. Defendant SCRUBSCO knew of Plaintiff STEIN DESIGNS' marks based on its previous lengthy distributorship with your Plaintiff. Defendant SCRUBSCO, known to the public of compression sock buyers as a business affiliate and distributor of Plaintiff STEIN DESIGNS, intended to misrepresent and fraudulently trick the public into believing the compression sock patterns sold by Defendant SCRUBSCO were actually those of Plaintiff STEIN DESIGNS, as the source, or that Plaintiff STEIN DESIGNS sponsored, endorsed, or was affiliated in connection with Defendant SCRUBSCO'S use of the marks for the goods and services. See Exhibits.

- 27. Defendant SCRUBSCO willfully adopted the patterns on the compression sock product and these activities constitute unfair competition under Tex. Bus. & Comm. Code Section 16.29 and State of Texas common law, unjust enrichment and passing off. Further, the continued use of these marks creates a substantial likelihood of confusion to the public of compression sock buyers. These buyers will be confused through this deceit and Defendant SCRUBSCO will profit from the hard earned goodwill and reputation of Plaintiff STEIN DESIGNS.
- 28. The actions of Defendant SCRUBSCO as described above constitutes gross negligence. In this regard, the conduct of the Defendant SCRUBSCO was done intentionally to produce confusion, willfully, heedlessly, in bad faith, and without regard to the rights of your Plaintiff and the damages and injuries that might be inflicted by such conduct.
- 29. As a direct result of Defendant SCRUBSCO'S actions as stated above, Plaintiff STEIN DESIGNS has sustained serious damages and will continue to sustain serious damages including lost profits, goodwill, and Defendant's unjust enrichment.
- 30. Plaintiff STEIN DESIGNS requests a temporary injunction be issued upon a hearing enjoining Defendant SCRUBSCO from the activities described above or else Plaintiff STEIN DESIGNS will be irreparably harmed as there is no other adequate remedy at law.

Federal Unfair Competition Claim for False Designation of Origin

- 31. Plaintiff STEIN DESIGNS incorporates the preceding paragraphs herein. The acts of Defendant SCRUBSCO herein violated Section 43(a)(1) of the Lanham Act [15 U.S.C. Section 1125(a)].
- 32. Plaintiff STEIN DESIGNS has consistently used the packaging and wrapping, packaging design template and color fills, labeling and wording, including "therapeutic," and marketing techniques such as the radial ad since early 2012 for the sale of compression socks. *See Exhibits K, L.* This packaging, known industry wide to buyers, including but not limited to sales representatives, is inherently distinctive of Plaintiff STEIN DESIGNS well-known compression sock business.
- 33. After the failure of payment to your Plaintiff in 2015, Defendant SCRUBSCO created and has been using almost identical packaging on its compression socks as that of Plaintiff STEIN DESIGNS, a confusingly similar design template for the packaging, confusingly similar wording, including but not limited to the word "therapeutic" on its packaging to the same industry of buyers. Defendant SCRUBSCO knew of Plaintiff STEIN DESIGNS' marks based on its previous distributorship with your Plaintiff. Defendant SCRUBSCO, used these marks and intended to deceive the public by leading them to believe the compression socks sold by Defendant SCRUBSCO were actually those of Plaintiff STEIN DESIGNS, as to the origin and source of the product, or that Plaintiff STEIN DESIGNS sponsored, endorsed, or was affiliated in connection with Defendant SCRUBSCO'S use of the marks for the goods and services. *See Exhibits K, L and H.* The use

of these marks and trade dress will likely confuse the public or cause the public to be mistaken as to the origin of Plaintiff STEIN DESIGNS' compression socks and the actions stated above constitute unfair competition for false designation of origin and violates Section 43(a)(1) of the Lanham Act.

- 34. As a direct result of Defendant SCRUBSCO'S actions as stated above, Plaintiff STEIN DESIGNS has sustained serious damages and will continue to sustain serious damages including lost profits, goodwill, and Defendant's unjust enrichment.
- 35. Plaintiff STEIN DESIGNS requests a temporary injunction be issued upon a hearing enjoining Defendant SCRUBSCO from the activities described above or else Plaintiff STEIN DESIGNS will be irreparably harmed as there is no other adequate remedy at law.

#### Texas Common Law Trademark Infringement Claim

- 36. Plaintiff STEIN DESIGNS incorporates the preceding paragraphs herein.
- 37. Defendant SCRUBSCO willfully adopted, used and continues to use the marks, including, packaging, packagin design template, labeling, wording, including the word "therapeutic," and use of marketing techniques on the compression sock product and the use of these infringing activities constitutes common law trademark infringement in the State of Texas. The use of these marks creates a likelihood of confusion among material buyers including but not limited to sales representatives within the industry.

- 38. As a direct result of Defendant SCRUBSCO'S infringing activities, Plaintiff STEIN DESIGNS has sustained serious damages and will continue to sustain serious damages including lost profits and Defendant's unjust enrichment.
- 39. Plaintiff STEIN DESIGNS requests a temporary injunction be issued upon a hearing enjoining Defendant SCRUBSCO from the activities described above or else Plaintiff STEIN DESIGNS will be irreparably harmed.

#### Trade Dress Infringement Claim

- 40. Plaintiff STEIN DESIGNS incorporates the preceding paragraphs herein.
- 41. The acts of Defendant SCRUBSCO herein violated Section 43(a) of the Lanham Act [15 U.S.C. Section 1125(a)] and Texas common law.
- 42. The element of trade dress as it relates to Plaintiff STEIN DESIGNS is the combination of packaging, packaging design template and color fills, labeling and wording. At the very least, Plaintiff STEIN DESIGNS has consistently used the packaging and wrapping technique on the back of the product with the circular closure, packaging design template and color fills, labeling and wording, including "therapeutic," and marketing techniques such as the radial ad since early 2012 in connection with 8-15' compression socks. See Exhibits K and L. This combination of product features creates a comprehensive, industry wide trade dress image to buyers, including but not limited to sales representatives. This element of trade dress is known industry wide to the material groups of compression sock buyers and the public and has been associated with Plaintiff STEIN DESIGNS' business for years. The inclusive product features referenced above are inherently distinctive and

unique of Plaintiff STEIN DESIGNS compression sock business. When customers see the packaging and wrapping of compression socks in the white package with the particular type of circular closure in the back, it is so distinct that it connects directly to Plaintiff STEIN DESIGNS. Additionally, these packaging features, including design template, wording, and labeling are non-functional design features that have been associated with Plaintiff STEIN DESIGNS' business as the source of the compression sock product consistently over the years. In totality, this overall combination of product packaging features identify with the well-known business of Plaintiff STEIN DESIGNS, not just the compression sock for purchase. *See Exhibits K, L and H*.

43. After the failure of payment to your Plaintiff and also since 2015, Defendant SCRUBSCO created and has been using a confusingly similar trade dress, including packaging and wrapping technique on its compression socks, a confusingly similar design template for the packaging, confusingly similar wording, including but not limited to the word "therapeutic" on its packaging as that of Plaintiff STEIN DESIGNS to the same industry of buyers. Defendant SCRUBSCO knew of Plaintiff STEIN DESIGNS' trade dress based on its previous lengthy distributorship with your Plaintiff. Defendant SCRUBSCO, known to the public of compression sock buyers as a long time business affiliate and distributor of Plaintiff STEIN DESIGNS, intended to fraudulently deceive the public into believing the compression socks sold by Defendant SCRUBSCO were actually those of Plaintiff STEIN DESIGNS, as the source, or that Plaintiff STEIN DESIGNS sponsored, endorsed, or was affiliated in connection with Defendant SCRUBSCO'S use of the trade

dress for the goods and services. *See Exhibits H, K, L*. This likelihood of confusion as to the source of the trade dress and the sponsorship of the trade dress is blatantly manifested through the channel of sale on a third party website, istore.iworkandplay.com/footwear-socks-cutieful. Specifically, in *Exhibit M*, attached, a screenshot of a compression sock, of Plaintiff STEIN DESIGNS' originally and innovatively designed pattern, is shown with the Celeste Stein crown logo. However, in *Exhibit N*, once the mouse is placed on that product on the screen, "Cutieful," Defendant SCRUBSCO'S brand name, comes up as the source or suggests sponsorship and affiliation. Additionally, right underneath these socks on that same website is a side by side of Plaintiff STEIN DESIGNS' total packaging of "therapeutic" socks for sale and Defendant SCRUBSCO'S total packaging of "therapeutic" compression socks for sale only leading to more likelihood of confusion. *See Exhibit O in connection with Exhibit H, K and L*.

44. Defendant SCRUBSCO willfully adopted the packaging, packaging design template, wording, including the use of the word "therapeutic", and use of marketing techniques on the compression sock product and these activities constitute trade dress infringement under Section 43 of the Lanham Act and State of Texas common law. Further, the continued use of these marks creates a likelihood of confusion to the public of compression sock buyers. These buyers will be confused through this deceit and Defendant SCRUBSCO will profit from the hard earned goodwill and reputation of Plaintiff STEIN DESIGNS.

WHEREFORE, PREMISES CONSIDERED, Plaintiff STEIN DESIGNS prays that Defendant SCRUBSCO and Defendant LANDRITH be cited in terms of law to appear and answer herein, and that upon final hearing, Plaintiff STEIN DESIGNS recovers of and from the Defendant SCRUBSCO the principal sum of the unpaid account \$34,452.00, any interest, attorney's fees, actual damages, exemplary damages, the total of which will not exceed \$75,000, injunctive relief, all taxable costs of Court, and such other and further relief, at law and in equity, to which Plaintiff STEIN DESIGNS may show itself justly entitled to receive.

Respectfully submitted,

THE LAW FIRM OF ALTON C. TODD

By:

Alton C. Todd

State Bar No. 20092000

312 S. Friendswood Drive

Friendswood, Texas 77546

(281) 992-8633

(281) 648-8633 Facsimile

ATTORNEY FOR PLAINTIFF

#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been forwarded to all counsel of record by regular mail, certified mail, return receipt requested, facsimile and/or email on this the 10 day of September, 2016.

Justin W. R. Renshaw

2900 Weslayan, Suite 230

Houston, Texas 77027

Phone: 713.400.9001

Fax: 713.400.9006

justin@renshaw-norwood.com

Alton C. Todd

CAUSE	10	
CELESTE STEIN DESIGNSS, INC. PLAINTIFF,	§ §	IN THE DISTRICT COURT OF
vs.	§ § §	GALVESTON COUNTY, TEXAS
SCRUBSCO LTD., and THOMAS LANDRITH DEFENDANTS.	<b>9</b> <b>9</b>	JUDICIAL DISTRICT COURT
	AFFIDA	AVIT
STATE OF TEXAS :		
COUNTY OF :		
BEPORE ME, the undersigned a Stein, who, after being duly sworn by m Rule of Civil Procedure 185:	uthority, e depose	on this day personally appeared Celeste d and stated the following pursuant to Toxas
1. My name is Celeste Stein, capable of making this Af stated herein.	. I am abo Tidavit a	ove the age of 18 years, of sound mind, and have personal knowledge of the facts
	·	ched documents on unpaid account is within
4. The above claim is due.		
6. The attached documents we regular course of business Designs, Inc with personal records or to transmit info	vere made for an end knowled rmation (	its and credits have been allowed.  It in the regular course of business; it was the inployee or representative of Celeste Stein dge of the act, event or condition to make the to be included in them, and they were made or condition or reasonably soon thereafter.
Further, Affiant sayeth not.		Celeste Stein
SWORN TO and SUBSCRIBED	before m	e on this 3rday of Novumber

2015, to certify which witness my hand and scal of office

Notary Public in and for State of Texas



#### NO. 15-CV-1174

CELESTE STEIN DESIGNS, INC. PLAINTIFF,	<b>5 6 6</b>	IN THE DISTRICT COURT OF
vs.	9 69 69	GALVESTON COUNTY, TEXAS
SCRUBSCO LTD., and	8	
THOMAS LANDRITH	\$	
DEFENDANTS.	8	405th JUDICIAL DISTRICT COURT

#### AFFIDAVIT

STATE OF TEXAS

COUNTY OF

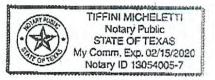
BEFORE ME, the undersigned authority, on this day personally appeared Celeste Stein, who, after being duly swom by me deposed and stated the following pursuant to Texas Rule of Civil Procedure 185:

- My name is Celeste Stein. I am above the age of 18 years, of sound mind, capable of making this Affidavit and have personal knowledge of the facts stated herein.
- 2. The above claims are just and true.

Further, Affiant sayeth not.

me on this W day of SPHMblr,

2010 SWORN TO and SUBSCRIBED before me on this 10 day of 1977 Mblv, 2013; to certify which witness my hand and seal of office.



Notary Public in and for State of Texas

#### NO. 15-CV-1174

CELESTE STEIN DESIGNS, INC. PLAINTIFF,	§ §	IN THE DISTRICT COURT OF
•	5	
vs.	§	GALVESTON COUNTY, TEXAS
	§	
SCRUBSCO LTD., and	ş	
THOMAS LANDRITH	ş	
DEFENDANTS.	§	405th JUDICIAL DISTRICT COURT

#### AFFIDAVIT

STATE OF TEXAS

**COUNTY OF** 

:

:

BEFORE ME, the undersigned authority, on this day personally appeared Dori Golan, who, after being duly sworn by me deposed and stated the following pursuant to Texas Rule of Civil Procedure 185:

- 1. My name is Dori Golan. I am above the age of 18 years, of sound mind, capable of making this Affidavit and have personal knowledge of the facts stated herein.
- 2. I am the President of Celeste Stein Designs, Inc.
- The above claims are just and true.

Further, Affiant sayeth not.

Dori Golen

2016 SWORN TO and SUBSCRIBED before me on this 10 day of 1771 her 2015, to certify which witness my hand and seal of office.

TIFFINI MICHELETTI
Notary Public
STATE OF TEXAS
My Comm. Exp. 02/15/20/20
Notary ID 13054005-7

Notary Public in and for
State of Texas

#### Case 3:16-cv-00297 Document 1-4 Filed in TXSD on 10/19/16 Page 80 of 136

09/22/2015 3:56 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

图 0002/0007

Page: 1

9/22/15 at 16:46:13.94

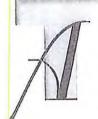
#### CELESTE STEIN DESIGNS INC.

Aged Receivables

As of Sep 30, 2015
Filter Criteria includes: 1) IDs from SCRUBSCO to SCRUBSCO; 2) Includes Drop Shipments. Report order is by ID. Report is printed in Detail Format.

VIII.					,	
Customer ID Customer Bill To Contact Telephone 1	Involce/CM#	0-30	31-60	61-90	Over 90 days	Amount Due
SCRUBSCO SCRUBSCO 513-238-7190	16904 16938 16939			810.00 22,062.00	8,580.00	8,580.00 810.00 22,062.00
SCRUBSCO SCRUBSCO				22,872,00	8,580.00	31,452.00
Report Yotal	-			22,872.00	8,580.00	31,452.00





# THE LAW FIRM OF ALTON C. TODD

Alton C. Todd\* Jeffrey N. Todd\*\* Dana R. Todd\*\*\*

alton@actlaw.com ieff@actlaw.com dana@actlaw.com

Principal Office: 312 S. Friendswood Drive Friendswood, TX 77546 281.992.8633 Toll Free: 888.388.8633

July 28, 2015

Mr. Tom Landrith Scrubsco 8216 Princeton Glendale Rd, Box 199 West Chester, Ohio 45069

Vin First-Class Mail & Email tomlandrith@gmail.com

RE:

My client:

Celeste Stein Designs, Inc.

Past due invoices: \$34,452.00

Dear Mr. Landrith:

Please be advised that I have been retained to represent Celeste Stein Designs, Inc. to collect the above past due invoices in the amount of \$34,452.00. As I understand it, there is no question that you received the items and goods reflected on the invoices and that you have been in contact with Celeste Stein Designs, Inc. concerning your account. Unfortunately, you have not presented a viable payout to Celeste Stein Designs, Inc. Accordingly, the matter has been referred to me for collection. Before beginning the formal collection process, I would suggest that you contact Celeste Stein Designs, Inc. in a last effort to bring this past due account current. However, if this matter is not resolved within the very near future, I will have no other alternative than to file suit. If litigation is necessary, we will seek not only the past due amounts but additional sums as interest, costs and reasonable attorney fees.

Thanking you, I remain

Very truly yours,

Alton C. Todd

ACT/fff

Houston Office:

4141 Southwest Freeway Suite 300 Houston, TX 77027

713.623.2337

www.altontodd.com

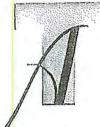
\*Board Certified in Personal Injury Trial Law and Civil Trial Law by The Texas Board of Legal Specialization, National Board of Trial Advocacy. Licensed to practice in Georgia and Texas

\*\* Licensed to practice in Texas, New York, New Jersey and Georgia \*\*\* Licensed to practice in Texas, New Jersey and Georgia

Fax: 281.648.8633 • thefirm@actlaw.com

Atlanta Office: 1170 Peachtree Street





# THE LAW FIRM OF ALTON C. TODD

Alton C. Todd\* Jeffrey N. Todd\*\* Dana R. Todd\*\*\*

alton@actlaw.com jeff@actlaw.com dana@actlaw.com

Principal Office: 312 S. Friendswood Drive Friendswood, TX 77546 281.992.8633 Toll Free: 888.388.8633

August 13, 2015

Mr. Tom Landrith Scrubsco 8216 Princeton Glendale Rd, Box 199 West Chester, Ohio 45069

Vin First-Class Mail & Email tomlandrith@gmail.com

RE:

My client:

Celeste Stein Designs, Inc.

Past due invoices: \$34,452.00

Dear Mr. Landrith:

Please be advised that I have been retained to represent Celeste Stein Designs, Inc. to collect the above past due invoices in the amount of \$34,452.00. As I understand it, there is no question that you received the items and goods reflected on the invoices and that you have been in contact with Celeste Stein Designs, Inc. concerning your account. Unfortunately, you have not presented a viable payout to Celeste Stein Designs, Inc. Accordingly, the matter has been referred to me for collection. Before beginning the formal collection process, I would suggest that you contact Celeste Stein Designs, Inc. in a last effort to bring this past due account current. However, if this matter is not resolved within the very near future, I will have no other alternative than to file suit. If litigation is necessary, we will seek not only the past due amounts but additional sums as interest, costs and reasonable attorney fees.

Thanking you, I remain

Very truly yours,

/s/ Alton C. Todd

Alton C. Todd

ACT/fff

Houston Office:

41 Southwest Freeway Suite 300 Houston, TX 77027

713.623.2337

vvvw.altentedd.com

"Board Certified in Personal Injury Trial Law and Civil Trial Law by The Texas Board of Legal Specialization, National Board of Trial Advocacy. Licensed to practice in Georgia and Texas

> \* \* Licensed to practice in Texas, New York, New Jersey and Georgia " " Licensed to practice in Texas, New Jersey and Georgia

> > Fax: 281.648.8633 . thefirm@actlaw.com

Atlanta Office:

1170 Peachtree Street **Suite 1200** Atlanta, GA 30309

770.645.8633

www.altontoddlaw.com

#### **Outstanding Scrubsco Invoices**

Invoice

Invoice# Date

Due Date PO#

Paid

16904 5/29/2015 6/29/2015 1174 \$23,580.00 \$7,500.00 6/29/2015 Visa

\$3,000.00 6/25/2015 Check #1152

\$1,500.00 7/7/2015 Check #1154

\$11,580.00 Remaining Invoice Balance

16938 6/5/2015 7/5/2015 1173

\$810.00

16939 6/5/2015 7/5/2015 1174 \$22,062.00

\$22,872.00

\$34,452.00 Total Amount Due



# ~ celeste stein designs inc.

The American Printcess 7801 Bayside Ave.

7801 Bayside Ave. Galveston, TX 77554 (409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.colestestein.com

Sold To:

SCRUBSCO 8216 PRINCETON GLENDALE RD

**BOX 199** 

WEST CHESTER, OH 45069

USA

**Invoice Number:** 

Invoice Date:

Invoice 16904

5/29/15

Page: 1

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069

USA

	P O Number	Terms	REP	Ship Via	Reference	
ı	1174	Net 30 Days		FED EX	ļ	

Quantity	ltem	Description	Unit Price	Extension
185.00	CMPS-1097	SUPPORT SOCK, BLUE MULTI HEARTS	6.00	1,110.00
	CMPS-1143	SUPPORT SOCK, TATTOO PARLOR	6.00	
	CMPS-1286	COMP SOX, 8-16, BLACK VOGUE	6.00	
420.00	CMPS-1353	COMP SOCK, LEOPARD & ROSES	6.00	2,520.00
266.00	CMPS-1626	SUPPORT SOCK, RAINBOW 60'S	6.00	1,596.00
150.00	CMPS-1 <i>5</i> 34	COMP SOX, 8-15, PINK BIKER HEART	6.00	900.00
200.00	CMPS-1538	SUPPORT SOCK, BRIGHT MAJIK	6.00	1,200.00
250.00	CMPS-1576	COMP SOX, 8-15, DENIM DOTTY	6.00	1,500.00
250.00	CMPS-1613	COMPRESSION SOCK,MEGAN	6.00	1,500.00
299.00	CMPS-1714	COMP SOX, 8-15, RED ALL TATTOO	6.00	1,794.00
150.00	CMPS-1721	SUPPORT SOCK, RASPBERRY HILL	6.00	800.00
80.00	CMPS-1755	SUPPORT SOCK, RAINBOW LEOPARD	6.00	540.00
k	CMPS-1804	SUPPORT SOCK, MULTI PEACE	6.00	
65.00	CMPS-1806	COMP SOX, 8-15, BLACK FOUNTAIN	6.00	390.00
151.00	CMPS-1822	COMP SOX, 8-15, ABSTRACT ROSES	6.00	906.00
ķ	CMPS-1851	COMP SOX, 8-15, BROWN LEOPARD RIVER	6.00	
100.00	CMPS-1863	SUPPORT SOCK, CELESTENSTEIN	6.00	600.00
k	CMP\$-1905	COMP SOX, 8-15, BABY OWLS	6.00	

Subtotal

Continued

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects  $\varepsilon$  to report them to our office. Credit memos will only be granted if we find the item to be a defect. Thank you for your business.

TOTAL

Continued

## celeste stein designs inc.

The American Printcess 7801 Bayside Ave.

Galveston, TX 77554 (409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To:

USA

SCRUBSCO 8216 PRINCETON GLENDALE RD **BOX 199** WEST CHESTER, OH 45069

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069

Invoice Number:

Invoice Date:

Invoice

Page: 2

16904

5/29/15

P O Number	Terms	REP	Ship Via	Reference
1174	Net 30 Days		FED EX	

Quantity	Item	Description	Unit Price	Extension
250.00	CMPS-1910	COMP SOX, 8-15 mm/Hg, BLUE LEOPARD	6.00	1,500.00
	CMPS-1940	COMP SOX, 8-15 mm/Hg, LEOPARD FLOWERS	6.00	
195.00	CMPS-1967	COMP SOX, 8-15 mm/Hg, STAR GAZER RED WHITE BLUE	6.00	1,170.00
147.00	CMPS-1988	COMP SOX, 8-15 mm/Hg, TURQ KLARA	6.00	882.00
	CMPS-340	COMP SOCK, 8-15, BLACKY	6.00	
	CMPS-341	COMP SOX 8-15, mm/Hg, AUSTIN POWERS	6.00	
218.00	CMPS-450	COMP SOX, 8-15, BLACK BUTTERFLIES	6.00	1,308.00
	CMPS-458	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	
274.00	CMPS-466	COMP SOX, 8-15, RAINBOW ZEBRA	6.00	1,644.00
	CMPS-522	COMP SOX, 8-15, CHOCOLATES	6.00	
	CMPS-587	COMP SOX, 8-15, PINK FUSCHIA CHEETAH	6.00	
270.00	CMPS-593	COMP SOCK 8-15 mm/Hg, HAIRY LEOPARP	6.00	1,620.00
	CMPS-809	SUPPORT SOCK, ZEBRA	6.00	
1	CMPS-1137	SUPPORT SOCK, COMIC	6.00	

Subtotal

23,580.00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects ε to report them to our office. Credit memos will only be granted if we find the item t be a defect. Thank you for your business.

TOTAL

11,580.00

## celeste stein designs inc.

The American Printcess 7801 Bayside Ave.

Galveston, TX 77554 (409) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To: 8216 PRINCETON GLENDALE RD **BOX 199** WEST CHESTER, OH 45069 USA

Invoice Number: invoice Date:

Invoice

16938

6/5/15

Page:

Ship to:

SCRUBSCO **5368 PINECASTLE** WEST CHESTER, OH 45069

P O Number	Terms	REP	Ship Via	Reference
1173	Nat 30 Dave		FED EX	1

Quantity	Item	Description	Unit Price	Extension
	CMPS-1247	SUPPORT SOCK, D' FEET BREAST CANCER	6.00	
<b> </b>	CMP\$-1353	Comp sock, Leopard & Roses	6.00	
į.	CMPS-1526	SUPPORT SOCK, RAINBOW 60'S	6.00	
<b>,</b>	CMPS-1576	COMP SOX, 8-15, DENIM DOTTY	6.00	
ŀ	CMPS-1714	COMP SOX, 8-15, RED ALL TATTOO	6.00	
ķ	CMPS-1755	SUPPORT SOCK, RAINBOW LEOPARD	6.00	
k	CMPS-1848	COMP SOX, 8-15, PURPLE CUPCAKES	6.00	
k	CMPS-1850	SUPPORT SOCK, MULTI MOGO	6.00	
<b>k</b>	CMPS-1861	COMP SOX, 8-15, BROWN LEOPARD RIVER	6.00	
k	CMPS-1910	COMP SOX, 8-15 mm/Hg, BLUE LEOPARD	6.00	
k	CMP8-1940	COMP SOX, 8-15 mm/Hg, LEOPARD FLOWERS	6.00	
k	CMPS-1967	COMP SOX, 8-15 mm/Hg, STAR GAZER RED WHITE BLUE	6.00	
k	CMPS-2007	SUPPORT SOCK, BLUE CHEETAH HEART	6.00	
135.00	CMPS-2008	SUPPORT SOCK, PINK CHEETAH HEART	6.00	810.00
k	CMPS-458	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	
ŀ	CMPS-593	COMP SOCK 8-15 mm/Hg, HAIRY LEOPARP	6.00	

Subtotal

810.00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects & to report them to our office. Credit memos will only be granted if we find the item t be a defect. Thank you for your business.

**TOTAL** 

810.00

# releste stein designs inc.

The American Printcess 7801 Bayside Ave.

7801 Bayside Ave. Gaiveston, TX 77554 (408) 763-1009 (409) 763-1084 Fax

e-mail: aprintcess@celestestein.com

www.celestestein.com

Sold To:

SCRUBSCO 8216 PRINCETON GLENDALE RD BOX 199 WEST CHESTER, OH 45069 USA Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069 USA

**Invoice Number:** 

Invoice Date:

Invoice

Page:

16939

6/5/15

P O Number	Terms	REP	Ship Via	Reference
1174	Net 30 Days		FED EX	

Quantity	ltem	Description	Unit Price	Extension
	CMPS-1097	SUPPORT SOCK, BLUE MULTI HEARTS	6.00	
165.00	CMPS-1143	SUPPORT SOCK, TATTOO PARLOR	6.00	990.00
461.00	CMPS-1286	COMP SOX, 8-15, BLACK VOGUE	6.00	2,766.00
	CMPS-1353	COMP SOCK, LEOPARD & ROSES	6.00	
	CMPS-1 <i>5</i> 26	SUPPORT SOCK, RAINBOW 60'S	6.00	
93.00	CMPS-1576	COMP SOX, 8-15, DENIM DOTTY	6.00	558.00
,	CMPS-1714	COMP SOX, 8-15, RED ALL TATTOO	6.00	
160.00	CMPS-1755	SUPPORT SOCK, RAINBOW LEOPARD	6.00	980.00
347.00	CMPS-1804	SUPPORT SOCK, MULTI PEACE	6.00	2,082.00
181.00	CMPS-1806	COMP SOX, 8-15, BLACK FOUNTAIN	6.00	1,086.00
k	CMPS-1822	COMP SOX, 8-15, ABSTRACT ROSES	6.00	
200.00k	CMPS-1850	SUPPORT SOCK, MULTI MOGO	6.00	1,200.00
270.00	CMPS-1851	COMP SOX, 8-15, BROWN LEOPARD RIVER	6.00	1,620.00
310.00	CMPS-1905	COMP SOX, 8-15, BABY OWLS	6.00	1,860.00
k	CMPS-1940	COMP SOX, 8-15 mm/Hg, LEOPARD FLOWERS	6.00	-
200.00	CMPS-1945	COMP SOX, 8-15 mm/Hg, 60' S DAISY RED	6.00	1,200.00
k	CMPS-1967	COMP 80X, 8-15 mm/Hg, STAR GAZER RED WHITE BLUE	6.00	·

Subtotal

Continued

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects  $\epsilon$  to report them to our office. Credit memos will only be granted if we find the item to be a defect. Thank you for your business.

TOTAL

Continued

# releste stein designs inc.

The American Printcess
7801 Bayside Ave.
Galveston, TX 77554
(409) 763-1009
(409) 763-1084 Fax
e-mail: aprintcess@celestestein.com

www.calestestein.com

Sold To:

SCRUBSCO 8216 PRINCETON GLENDALE RD BOX 199 WEST CHESTER, OH 45069 USA Invoice Number:

Invoice Date:

Invoice 16939

6/5/15

Page: 2

Ship to:

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069 USA

P O Number	Terms	REP	Ship Via	Reference
1174	Net 30 Davs		FED EX	

Quantity	Item	Description	Unit Price	Extension
150.00	CMPS-1983	COMP SOX, 8-15 mm/Hg, SUZZI	6.00	900.00
	CMPS-1988	COMP SOX, 8-15 mm/Hg, TURQ KLARA	6.00	
100.00	CMPS-264	SUPPORT SOCK, KITTY	6.00	600.00
100.00	CMPS-265	SUPPORT SOCK, DOGGIE	6.00	600.00
277.00	CMPS-340	COMP SOCK, 8-15, BLACKY	6.00	1,662.00
	CMPS-341	COMP SOX 8-15, mm/Hg, AUSTIN POWERS	6.00	
	CMPS-450	COMP SOX, 8-15, BLACK BUTTERFLIES	6.00	
84.00	CMPS-458	COMP SOX, 8-15 mm/Hg, BLUE CAMO	6.00	504.00
k	CMPS-466	COMP SOX, 8-15, RAINBOW ZEBRA	6.00	
204.00	CMPS-522	COMP SOX, 8-15, CHOCOLATES	6.00	1,224.00
k	CMPS-587	COMP SOX, 8-15, PINK FUSCHIA CHEETAH	6.00	
k	CMPS-593	COMP SOCK 8-15 mm/Hg, HAIRY LEOPARP	6.00	
303.00	CMPS-809	SUPPORT SOCK, ZEBRA	6.00	1,818.00
60.00	CMPS-S	COMP SOX, 8-15, SOLID BEIGE	2.00	120.00
28.00	CMPS-1137	SUPPORT SOCK, COMIC	6.00	168.00
24.00	CMPS-1476	SUPPORT SOCK, CLASSIC HOUNDSTOOTH	6.00	144.00

Subtotal

22,062.00

Freight

RETURN POLICY: Customers have 10 days to inspect merchandise for defects  $\varepsilon$  to report them to our office. Credit memos will only be granted if we find the item t be a defect. Thank you for your business.

TOTAL

22,062.00

#### Cuticful Distribution / Scrubsco

513-874-5486

### **Purchase Order**

8716 Princeton Glandale Rd BOX 199 West Chester, OH 45069 scrubscumpany@qmail.com Phone # 513-238-7190

cutieful4u@gmail.com cutileful4u,com Date P.O. No.
4/15/2015 1173

#### Vendor

CELESTE STEIN DESIGNS Galveston, TX		

Ship To	
SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069	
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**Total** 

#### Cutleful Distribution / Scrubsco

513-874-5486

### **Purchase Order**

8216 Princeton Glendale Rd 80X 199 West Chaster, OH 45069 scrubscompany@amail.com Phone # 513-238-7190

cutteful4u@gm&d.com cuttleful4u,com Pate P.O. No.
4/15/2015 1173

#### Vendor

Fax #

CELESTE STEIN DESIGNS Galveston, TX	

Ship To	
SCRUBSCO S368 PINECASTLE WEST CHESTER, OH 45069	

Item	Description	Qty	Rate	MPN	Amount
1804-CMP5K	COMPRESSION SOCK 8-15MM HG	150	6.00		900.00
1806-CMPSK	MULTI PEACE COMPRESSION SOCK 8-15 MM HG	200	6.00		1,200.00
1822-CMPSK	BLACK FOUNTAIN COMPRESSION SOCK B 15MM HG	150	6.00		900.00
1848-CMPSK	ABSTRACT ROSES COMPRESSION SOCKS 8 15 MM HG	200	6.00		1,200.00
1850-CMPSK	PURPLE CUPCAKES COMPRESSION SOCKS 8-15 MM HG	100	6.00		600.00
1851-CMPSK	MULTI GIGO COMPRESSION SOCKS 8-15 MM HG	100	6.00		600.00
1863 CMP\$K8	BROWN LEOPARD RIVER COMPRESSION SOCK 8-15MM HG	150	6.00		900.00
1905-CMPSK	CELESTE STEIN COMPRESSION SOCKS 8-15 MM HG	500	6,00		3,000.00
1910-CMPSK	COMPRESSION SOCK 8 15 MM HG	100	6.00		600.00
1940-CMPSK	BLUE LEOPARO COMPRESSION SOCK 8 15 MM HG LEOPARD FLOWERS	50	6.00		300.00
1945-CMPSK	COMPRESSION SOCK 8 15 MM HG 60 S DAISIES	100	6.00		600.00
1967-CMPSK	COMPRESSION SOCK 8 - 15 MM HG STAR GAZER RWB	150	6.00		900.00
1983-CMPSK	COMPRESSION SOCK 8 15 MM HG	100	6.00		600.00
1988-CMPSK	COMPRESSION SOCK 8 15 MM HG TURQUOISE KLARA	150	6.00		900.00

**Total** 

#### Cutieful Distribution / Scrubsco

513-874-5486

### **Purchase Order**

8216 Princeton Glendale Rd BOX 199 West Chester, OH 45069 scrubscompanyblemail.com Phone # 513-238-7190

cutieful/us@gmail.com cutileful/uscom Date P.O. No. 4/15/2015 1173

#### Vendor

Fax ≠

The second secon	
CRUBSCO	
368 PINECASTLE	
7200 LIMECALINE	
WEST CHESTER, OH 45069	

**Total** 

Ship To

Item	Description	Qty	Rate	MPN	Amount
2007 CMPSK8	COMPRESSION SOCIC 8-15 MM HG	200	6.00		1,200.00
	BLUE CHEETAH HEART	200	6.00		1,200.00
2008 CMPSK8	COMPRESSION SOCK 8-15 MM HG PINK CHEETAH HEARTS	"	1		600.00
340-CMP5K815	COMPRESSION SOCK 8-15 mm Hg	100	6.00		
341-CMP5K815	COMPRESSION SOCK 8-15 MM HG	500	6.00		3,000.00
450-CMPSK815	A. POWERS COMPRESSION SOCKS 8-15MM HG	300	6.00		1,800.00
	BLACK BUTTERFLY	1,00	6.00		600.00
458-CMPSK815	COMPRESSION SOCKS 8 15 MM HG BLUE CAM	100			
466-CMPSK815	COMPRESSION SOCK 8 15 MM HG	200	6.00		1,200.00
593-CMPSK815	RAINBOW ZEBRA COMPRESSION SOCK B 15 MM HG	100	6.00		600.00
	HAIRY LEOPARD COMPRESSION SOCKS 8-15 MM HG	150	6.00		900.00
809-CMPSK815	FLOW ZEBRA	1 }	ı		200.00
1-CMPSK815	COMPRESSION SOCK B-15 MM WHITE	100	2.00		200.00
Z-CMPSKB15 PINK CMPSK	COMPRESSION SOCK 8-15 MM BLACK PINK COMPRESSION SOCK 8-15 MM HG	100	2.00		200.00
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			1		
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Page 3

\$35,400.00

#### Cuticful Distribution / Scrubsco

8216 Princeton Glendale Rd BOX 199 West Chestur, OH 45069 scrubscompony@email.com Phone # 513-892-9765

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513-874-5486 FAX #

cutie/ul4u@gmall.com cutileful/u.com

### **Purchase Order**

P.O. No. Date 1174 5/15/2015

#### Vendor

CELESTE STEIN DESIGNS Gulveston, TX	

#### Ship To

Itam	Description	Qty	Rato	MPN	Amount
1097- CMP5K	COMPRESSION SOCKS 8 15 MM	100	6.00	•	600.00
1143-CMPSK	BLUE MULTI PART COMPRESSION SOCKS 8 15 MM HG	150	6.00		900.00
1247-CMPSK	TATTOO PARLOR COMPRESSION SOCKS B 15 MM HG	250	6.00		1,500.00
1286-CMP5K	D FEET BREAST CANCER COMPRESSION SOCKS 8 15 MM HG	250	6.00		1,500.00
1353-CMPSK	BLACK VOGUE COMPRESSION SOCK 8 15 MM HG	250	6.00		1,500.00
1526-CMPSK	LEOPARD AND ROSES COMPRESSION SOCKS 8-15MM HG	250	6.00		1,500.00
1534-CMPSK	RAINBOW 60'S COMPRESSION SOCKS 8 15 MM HG	100	6.00		600.00
1538-CMPSK	PINK BIKER HEARTS COMPRESSION SOCK 8-15MM HG	150	6.00		900.00
	BRIGHT MAIL COMPRESSION SOCK 8 15 MM HG	150	6.00		900.00
1576-CMPSK	DENIM DOTTY	150	6.00		900.00
1613-CMPSK	COMPRESSION SOCK 8 15 MM HG MEGAN	1			1,500.00
1614-CMPSK	COMPRESSION SOCK 8 15 MM HG GREY DOT ART	250	6.00		1
1671-CMPSK	COMPRESSION SOCK 8-15 MM HG BLUE FLEUR MISSONI	250	6.00		1,500.00
1714-CMPSK	COMPRESSION SOCKS 8 - 15 MM HG RED ALL TATTOO	250	6.00		1,500.00
1721-CMPSK	COMPRESSION SOCK 8 15 MM HG RASPBERRY HILL	150	6.00		900.00
1755-CMPSK	COMPRESSION SOCK 8-15MM HG RAINBOW LEOPARD	100	6.00		600.00
	INTITUTE LEDICATE	1 1	1		1

Total

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#### Cutieful Distribution / Scrubsco

### **Purchase Order**

\*8216 Princeton Glendale Rd BOX 199 West Chester, OH 45069 scrubscompany@qniail.com Phone # 513-892-9265 Fax # 513-874-548G

cutleful4u@gmail.com cutileful4u.com Date P.O. No. 5/15/2015 1174

#### Vendor

CELESTE 5 Galveston,	TEIN DESIGNS TX	

### Ship To

SCRUBSCO 5368 PINECASTLE WEST CHESTER, OH 45069	

Item	Description	Qty	Rate	MPN	Amount
1804-CMPSK	COMPRESSION SOCK 8-15MM HG	100	6.00		600.00
1004-(1415)	MULTI PEACE				1,500.00
1806-CMPSK	COMPRESSION SOCK 8-15 MM HG	250	6.00		1,500.00
1000 6.1.2	BLACK FOUNTAIN			100	600.00
1822-CMPSK	COMPRESSION SOCK 8 15MM HG	100	6.00		000,00
	ABSTRACT ROSES	1			600.00
1850-CMPSK	COMPRESSION SOCKS 8-15 MM HG	100	6.00		000,00
	MULTI GIGO	200	r 00		1,200,00
1851-CMPSK	COMPRESSION SOCKS 8-15 MM HG	200	6.00		2/20017-
	BROWN LEOPARD RIVER	1,00	6.00		600.00
1863 CMPSK8	COMPRESSION SOCK 8-15MM HG	100	6.00		
	CELESTE STEIN	100	6.00		600.00
1905-CMPSK	COMPRESSION SOCKS 8-15 MM HG	100	0.00		
	TINY OWLS	150	6.00		900.00€
1910-CMPSK	COMPRESSION SOCK 8 15 MM HG	1 130	0,00		
	COMPRESSION SOCK 8 15 MM HG	250	6.00		1,500.00
1940-CMP5K	LEOPARD FLOWERS	250	0.00		
	POWER COLON COCK & 15 MM HC	100	6.00		600.00
1945-CMPSK	COMPRESSION SOCK & 15 MM HG	100	0.00		
ADEA CADER	GO S DAISIES COMPRESSION SOCK 8 - 15 MM HG	100	6.00		600.00
1967-CMPSK	STAR GAZER RWB	100	0.00		
1983-CMPSK	COMPRESSION SOCK B 15 MM HG	100	6.00		600.00
1963-Chir Skiii	SUZZI	1	28.53		10000
1988-CMPSK	COMPRESSION SOCK 8 15 MM HG	100	6.00		600.00
LUCU CHI ONIII	TUROUOISE KLARA				
264-CMP5K815	COMPRESSION SOCK 8- 15 MM HG	100	6.00		600.00

Total

#### Cutleful Distribution / Scrubsco

8216 Princeton Glendale Rd BOX 199 West Chester, OH 45069 scrubscompany@gm8il.com

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Phone # 513-892-9265 Fax # 513-874-5486 cutteful4vipgmoil.com cutteful4u.com

### **Purchase Order**

Date P.O. No. 5/15/2015 1174

#### Vendor

CELESTE STEIN DESIGNS Galvesten, TX	

#### Ship To

SCRUBSCO 5368 PINECASTLE WEST CHESTER, DH 45069

Item	Description	Qty	Rate	MPM	Amount
265-CMPSK815	COMPRESSION SOCK 8 -15 MM HG	100	6.00		600.00
503-CHL34013	DOGGIE	11	- 00		900.00
340-CMP\$KB15	COMPRESSION SOCK 8-15 mm Hg	150	6.00		
341-CMP5K815	Blackie COMPRESSION SOCK 8-15 MM HG A. POWERS	100	6.00		600.00
450-CMPSK815	COMPRESSION SOCKS 8-15MM HG	200	6.00		1,200.00
458-CMPSK815	BLACK BUTTERFLY COMPRESSION SOCKS B 15 MM HG	100	6.00		600,00
430-CMN24013	BLUE ÇAM				900.00
466-CMPSK815	COMPRESSION SOCK B 15 MM HG	150	6.00		300.00
522-CMPSK815	RAINBOW ZEBRA COMPRESSION SOCKS B-15 MM HG	100	6.00		600.00
•	CHOCOLATES	1.50	c no		900.00
587-CMPSK815	COMPRESSION SOCK 8-15 mm Hg Pink Fuchsia Cheeteh	150	6.00		
593-CMPSK815	COMPRESSION SOCK 8 15 MM HG	100	6.00		600.00
	HAIRY LEOPARD COMPRESSION SOCKS 8-15 MM HG	250	6.00		1,500.00
809-CMPSK815	FLOW ZEBRA	1 ~~			į
7-CMPSK815	COMPRESSION SOCK 8-15MM BEIGE	60	2.00		120.00
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Total

\$36,420.00

09/22/2015 3:56 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

@0003/0007

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9/22/15 at 16:47:54.30

#### CELESTE STEIN DESIGNS INC.

**Customer Ledgers** 

For the Period From Jan 1, 2013 to Sep 30, 2015
Filter Criteria includes: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Report is printed in Detail Format.

Customer ID Customer	Date	Trans No	Туре	Debit Amt	Credit Amt	Balanc
SCRUBSCO	5/9/13	13256	SJ	1,770.00		1,770.0
SCRUBSCO	5/30/13	13309	SJ	3,342.00		5,112.0
000000	6/11/13	13345	SJ	1,224.00		6,336.0
	6/11/13	13346	SJ	1,746.00		8,082.0
	6/12/13	1123/1124	CRJ	1,740,00	5,112.00	2,970.0
	7/3/13	13424	SJ	2,484.00	2,112.00	5,454.0
	7/3/13	13425	ŠJ	992.47		6,446.4
	7/17/13	1	CRJ	552.41	2,970.00	3,476.4
	8/2/13	13513	\$J	1,134.42	2,370.00	4.610.8
		200	CRJ	1,104.46	3,476.47	1,134.4
	8/8/13	1		4 202 46	3,470.47	2,437.8
	8/13/13	13585	SJ	1,303.45		
	8/13/13	13586	SJ	972.00		3,409.8
	8/22/13	13620	SJ	334.41		3,744.2
	9/6/13	9/6/13	CRJ	22722	1,134.42	2,609.8
	9/9/13	13669	SJ	864.00		3,473.8
	9/9/13	13670	ŞJ	3,960.00	- 6.0002.10	7,433.8
	9/12/13	9/13/13	CRJ		2,275,45	5,158.4
	9/20/13	9/20/13	CRJ		334.41	4.824.0
	9/20/13	13731	SJ	2,196.00	4	7,020.0
	9/20/13	13732	SJ	4,050.00		11,070.0
	10/3/13	13788	ŞJ	4,260.00		15,330.0
	10/3/13	13789	SJ	6,000.00		21,330.0
	10/8/13	10/08/13	CRJ	10.000	864.00	20,466.0
	10/11/13	562	CRJ		3,960.00	16,506.0
	10/11/13	13828	SJ	3,540.00		20,046.0
	10/21/13	10/21/13	CRJ	0,010.00	6,246.00	13,800.0
	10/21/13	13890	SJ	1,044.00	OJA TOTO	14,844.0
	10/25/13	13908	SJ	13,344.00		28,188.0
	11/5/13	11/5/13	CRJ	10,044,00	6,000.00	22,188.0
	11/0/10			2 100 00	0,000.00	25,386.0
	11/7/13	13976	SJ	3,198.00	4 200 00	21,126.0
	11/12/13	11/12/13	CRJ		4,260.00	
	11/13/13	11/13/13	CRJ		2,000.00	19,126.0
	11/18/13	11/14/13	CRJ		1,500.00	17,626.0
	11/18/13	11/15/13	CRJ		40.00	17,586.0
	11/20/13	11/20/13	CRJ		1,044.00	16,542.0
	12/2/13	1005	CRJ	7.2.2.2	13,344.00	3,198.0
	12/6/13	14161	SJ	1,542.00		4,740.0
	12/6/13	14162	SJ	5,544.00		10,284.0
	12/6/13	14163	SJ	3,491.00		13,775.0
	12/6/13	14164	SJ	3,456,00		17,231.0
	12/6/13	14165	SJ	1,368.00		18,599,0
	12/13/13	1006	CRJ		3,198.00	15,401.0
	1/8/14	1007	CRJ		7,086.00	8,315.0
	1/8/14	1008	CRJ		1,368.00	6,947.0
	1/10/14	1009	ÇRJ		3,491.00	3,456.0
	1/17/14	1010	CRJ		3,456.00	0.0
	1/23/14	14505	SJ	160.00		160.0
	1/24/14	14512	ŠJ	10,938.00		11,098.0
	2/7/14	14586	SJ	1,422.00		12,520.0
	2/7/14	14587	SJ	12,342.00		24,862.0
	2/24/14	0000001011 ck	CRJ	12,042.00	11,098.00	13,764.0
				E REC OO	11,000,00	19,320.0
	2/25/14	14673	SJ	5,556,00		20,550.0
	3/7/14	14709	SJ	1,230.00		
	3/7/14	14710	S.J	168.00		20,718.0
	3/7/14	14711	SJ	4,368.00		25,086.0
	3/7/14	14712	SJ	6,676.00		31,762.0
	3/13/14	3/13SCRUBSC	CRJ		12,096.00	19,666.0
	3/19/14	3/19SCRUBSC	CRJ		1,422.00	18,244.0
	3/20/14	14752	SJ	222.00		18,466.0
	3/20/14	14753	SJ	84.00		18,550.0
	3/20/14	14754	SJ	8,166,00		26,716.0
	3/25/14	14775	8.1	3,456.00		30,172.0
	3/26/14	1013 SCRUBS	CRJ		5,556.00	24,616.0



09/22/2015 3:56 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

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9/22/16 at 16:47:54.35

### CELESTE STEIN DESIGNS INC.

Customer Ledgers
For the Period From Jan 1, 2013 to Sep 30, 2015
Filter Criteria includes: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Report is printed in Datail Format.

istomer ID istomer	Dato	Trans No	Туре	Debit Amt	Crodit Amt	Balance
	0/07/14	14794	SJ	37.00		24,653.00
	3/27/14 3/27/14	14795	SJ	276.00		24,929.00
	3/27/14	14796	SJ	1,638.00		26,567.00
	3/27/14	14797	SJ	11,178.00		37,745.00
	4/3/14	1014	CRJ		1,398.00	36,347.00
	4/4/14	14832	SJ	10,494.00		46,841,00
	4/7/14	14839	SJ	3,180.00		50,021.00
	4/8/14	4/8/14	CRJ		4,368.00	45,653.00
	4/14/14	4/14/14	CRJ	10.00	6,676.00	38,977.00
	4/25/14	1012,1015	CRJ	5.00	5.00	38,977.00 30,259.00
	4/25/14	1012,1015	CRJ	-4.44	8,718.00	30,331.00
	5/2/14	14965	SJ	72.00		30,685.00
	5/2/14	14966	SJ	354.00		32,689.00
	5/2/14	14967	81	2,004.00		32,893.00
	5/2/14	14968	SJ	204.00		33,937.00
	5/2/14	14969	SJ	1,044.00 3,030.00		36,967.00
	5/2/14	14970	SJ	48.00		37,015.00
	5/2/14	14971	SJ	-10.00	13,129.00	23,886.00
	5/2/14	1016	CRJ		6,636.00	17,250.00
	5/2/14	5/2/14	CRJ SJ	2,400.00	*14*****	19,650.00
	5/14/14	15021	CRJ	2,400,00	10,494.00	9,156.00
	5/15/14 5/19/14	5/15/14 5/19/14	CRJ	48.00	48.00	9,156.00
	5/19/14	5/19/14	CRJ	70100	2,400.00	6,756.00
	5/22/14	15078	SJ	72.00	C244 C444 C345	6,828.00
	5/22/14	15079	SJ	9,654.00		16,482.00
	5/22/14	15080	SĴ	2,454.40		18,936,40
	6/2/14	6/2/14	CRJ	20, 13, 13, 13, 13	6,756.00	12,180.40
	6/2/14	15122	SJ	126.00		12,306.40
	6/2/14	15123	SJ	3,512.93		15,819.33
	6/9/14	15152	SJ	3,622.17		19,441.50
	6/20/14	15198	SJ	3,015,23		22,456.73
	6/20/14	15199	SJ	5,879.15		28,335.88
	6/21/14	8/21/14	CRJ		2,454.40	25,881.48
	6/21/14	6/21/14	CRJ		72.00	25,809.48
	6/23/14	6/21/14	CRJ	0 000 00	9,654.00	16,155.48 19,042.17
	6/30/14	15230	SJ	2,886.69	2 642 02	15,529.24
	7/2/14	7/2/14	CRJ		3,512.93 126.00	15,403.24
	7/2/14	7/2/14	CRJ	5,095.17	120.00	20,498.41
	7/3/14	15236	SJ CRJ	3,033.17	3,622.17	16,876.24
	7/8/14 7/11/14	7/2814 15268	SJ	600.00	Mammili	17,476.24
	7/11/14	15269	SJ	456.00		17,932,24
	7/11/14	15270	SJ	2,928.11		20,860.35
	7/18/14	15298	SJ	874.90		21,735.25
	7/18/14	15307	SJ	3,671.17		25,406.42
	7/18/14	15308	SJ	2,088.00		27,494.42
	7/18/14	15309	ŞJ	325.48	4-2-5-42	27,819.90
	7/21/14	7/21/14 1	CRJ		3,015.23	24,804.67
	7/21/14	7/21/14 2	CRJ		5,879.15	18,925.52
	7/22/14	15316	SJ	2,849.11		21,774.63
	7/23/14	15334	SJ	1,210,91	0.000.00	22,985.54
	7/30/14	7/30/14	CRJ		2,886.69	20,098.85
	8/1/14	8-1	CRJ	E ner ou	5,095.17	15,003.68 20,359.05
	8/1/14	15367	SJ	5,355,37 2,865,68		23,224.73
	8/8/14	15404	SJ	2,000.00	600.00	22.624.73
	8/11/14	8/11/14 8/11/14	CRJ CRJ		456.00	22,168.73
	8/11/14 8/11/14	8/11/14	CRJ		2,928.11	19,240.62
	8/18/14	8/18/14 1	CRJ		874.90	18,365.72
	8/18/14	8/18/14 2	CRJ		3,671.17	14,694.55
	8/18/14	8/18/14 3	CRJ		2,088.00	12,606.55
	8/18/14	8/18/14 4	CRJ		325.48	12.281.07

Page: 2

09/22/2015 3:58 PM FAX 409 763 1084

CELESTE STEIN DESIGNS

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9/22/15 at 16:47:54,37

#### CELESTE STEIN DESIGNS INC.

Customer Ledgers
For the Period From Jan 1, 2013 to Sep 30, 2015
Filter Criteria includes: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Report is printed in Detail Format.

Customer ID Customer	Date	Trans No	Туро	Dobit Amt	Credit Amt	Balance
	010044	010044.0	001		0.040.44	0 404 00
	8/22/14	8/22/14 2	CRJ		2,849.11 1,210.91	9,431.96 8,221.05
	8/26/14	8/26/14 1	CRJ	798.00	1,210.91	9,019.05
	8/29/14 8/29/14	15503 15505	SJ SJ	12,527.62		21,546.67
	9/2/14	9/2/14 1	CRJ	12,521.02	5,355.37	16,191.30
	9/8/14	9/8/14 1	CRJ		2,865.68	13,325.62
	9/18/14	15577	ŞJ	17,894.84	2,000.00	31,220.46
	9/23/14	15603	SĴ	7,951.95		39,172,41
	9/23/14	15604	SJ	640.00		39,812.41
	9/23/14	15605	SJ	5,796.00		45,608.41
	9/25/14	15612	SJ	3,511.81		49,120.22
	9/25/14	15621	SJ	5,784.09		54,904.31
	9/26/14	15628	SJ	2,421.69		57,326.00
	9/29/14	9/29/14	CRJ	-,	798.00	56,528.00
	9/29/14	9/29/14	CRJ		12,527.62	44,000,38
	10/6/14	15681	SJ	5,269.47		49,269.85
	10/17/14	10/17/14	CRJ		7,951.95	41,317.90
	10/17/14	15757	SJ	360.00	* 200 of # En	41,677.90
	10/17/14	15758	ŞJ	504.00		42,181.90
	10/17/14	15759	SJ	5,169.89		47,351.79
	10/22/14	1210	CRJ	6.00	6.00	47,351.79
	10/22/14	1210	CRJ		17,894.84	29,456.95
	10/22/14	15773	SJ	240.00		29,696.95
	10/22/14	15774	SJ	11,778.47		41,475.42
	10/23/14	10/23/14	CRJ		640.00	40,835,42
	10/23/14	10/23	CRJ		5,798.00	35,039,42
	10/27/14	10/27/14	CRJ		3,511.81	31,527.61
	10/27/14	10/27	CRJ		5,784.09	25,743.52
	10/27/14	10-27-14	ÇRJ	0.00007000	2,421,69	23,321.83
	10/31/14	15856	SJ	12,248.61	2 222 00	35,570.44
	11/7/14	11/7/14	CRJ		5,269.47	30,300.97
	11/17/14	11/17/14	CRJ		360.00	29,940.97
	11/17/14	11-17-14	CRJ		504.00	29,436.97
	11/17/14	Nov 17,2014	CRJ		5,169.89	24,267.08
	11/20/14	15991	SJ	2,214.00		26,481.08
	11/20/14	15992	SJ	6,200.26	040.00	32,681.34
	11/24/14	11/24/14	CRJ		240.00	32,441.34
	11/24/14	11-24-14	CRJ		11,778.47	20,662.87
	12/1/14	11/29/14	CRJ	0 101 00	12,248.61	8,414.26
	12/12/14	16148	SJ	2,484.00		10,898.26 14,720.26
	12/12/14	16149	SJ	3,822.00		24,416.55
	12/12/14	16150	SJ	9,696.29	6,200.26	18,216.29
	12/31/14	12/31/14	CRJ		2,214.00	16,002.29
	1/2/15	1/2/15	CRJ		2,484.00	13,518.29
	1/16/15 1/16/15	1/16/15 1/16/15	CRJ	4.1	3,822.00	9,696.29
	1/20/15	1/20/15	CRJ		9,696.29	0.00
	1/23/15	16332	SJ	1,309.82	Olangina	1,309.82
	1/23/15	16334	ธ์ม	1,188.00		2,497.82
	1/23/15	16335	ŞJ	1,306.08		3,803.88
	1/30/15	16357	ŠJ	13,499.15		17,303.03
	2/23/15	2/26/15	CRJ		1,309.82	15,993.21
	2/23/15	2/23/15	CRJ		1,188.00	14,805.21
	2/23/15	2/23/15	CRJ		1,306.06	13,499.15
	2/27/15	2/27/15	CRJ		5,500.00	7,999.15
	3/2/15	3/2/15	CRJ		7,999.15	0.00
	3/4/15	16518	SJ	1,698.00	247.000,000	1,698.00
	3/4/15	16525	SJ	11,970.00		13,668.00
	3/4/15	16526	SJ	2,976.00		16,644.00
	3/5/15	16528	SJ	7,284.00		23,928.00
	3/20/15	16596	SJ	720.00		24,648.00
	3/20/15	16597	SJ	6,678.00		31,326.00
	3/27/15	16618	SJ	20,832.00		52,158.00

09/22/2015 3:57 PM FAX 400 763 1084

CELESTE STEIN DESIGNS

Ø0008/0007

Pago: 4

9/22/15 at 16:47:54.38

### CELESTE STEIN DESIGNS INC.

**Customer Ledgers** 

For the Period From Jan 1, 2013 to Sep 30, 2015
Filler Critoria includea: 1) IDs from SCRUBSCO to SCRUBSCO. Report order is by ID. Report is printed in Datall Formal.

Customer ID Customer	Date	Trans No	Туре	Debit Amt	Credit Amt	Balance
	4/1/15	16643	SJ	4,014.00	<del></del> -	56,172.00
	4/2/15	4/2/15	CRJ	4,014.00	1,698.00	54,474.00
	4/2/15	4/2/15	CRJ		11,970,00	42,504.00
	4/2/15	4/02/15	CRJ			20 500 00
	4/6/15	4/8/15	CRJ		2,976.00	39,528.00
				4 800 80	7,284.00	32,244.00
	4/13/15	16692	SJ	1,800.00		34,044.00
	4/13/15	16893	SJ	3,168.00	WAD AA	37,212.00
	4/21/15	4/21/15	CRJ		720.00	36,492.00
	4/21/15	4-21-15	CRJ	202.025	6,678,00	29,814.00
	4/24/15	16749	SJ	822,00		30,636.00
	4/24/15	16750	SJ	558.00		31,194.00
	4/24/15	16751	SJ	28,398.00		59,592.00
	4/27/15	4/27/15	CRJ		20,832.00	38,760.00
	4/29/15	16773	ŞJ	1,392.00		40,152,00
	4/29/15	16774	SJ	1,482,00		41,634.00
	4/29/16	16775	SJ	5,256.00		46,890.00
	5/1/15	16791	SJ	5,226.00		52,116.00
	5/1/15	5/1/15	CRJ	0,000	4,014.00	48,102.00
	5/13/15	5/813/15	CRJ		1,800.00	46,302.00
	5/13/15	5/13/15	CRJ		3,168.00	43,134.00
				6,978.00	3,100.00	50,112.00
	5/20/15	18869	SJ	0,870.00	onn nn	
	5/22/15	5/22/15	CRJ		822.00	49,290.00
	5/22/15	5/22/15	ÇRJ		558.00	48,732.00
	5/22/15	5-22-15	CRJ	40.553.65	13,509.00	35,223.00
	5/22/15	16886	SJ	3,980.00		39,203.00
	5/22/15	16885	SJ	6,200.00	Total Sales	45,403.00
	5/26/15	5/26/15	CRJ		14,889,00	30,514.00
	5/29/15	5/29/15	CRJ		1,392.00	29,122.00
	5/29/15	5-29-15	CRJ		1,482,00	27,640.00
	5/29/15	5,29,15	CRJ		5,256.00	22,384.00
	5/29/15	5/29/15	CRJ		5,226.00	17,158.00
	5/29/15	16903	SJ	1,638.00		18,796.00
	5/29/15	16904	ŠJ	23,580.00		42,376,00
	6/5/15	16938	ŞJ	810.00		43,186,00
		16939	ŠĴ	22,062.00		65,248,00
	6/5/15		CRJ	22,002,00	6,978.00	58,270.00
	6/18/15	6/18/15	CDI		6,200.00	52,070.00
	6/19/15	619scr	CRJ		3,980.00	48,090.00
	6/19/15	0619scrubsco2	CRJ		1,638.00	46,452.00
	6/25/15	6/25/15	CRJ		7,000,00	38,952.00
	6/30/15	6/29/15	CRJ		7,500.00	
	6/30/15	1152	CRJ		3,000.00	35,952,00
	7/13/15	713SCRUBSC	CRJ		1,500.00	34,452,00
	7/27/15	1155	CRJ	12.510.61	2,000.00	32,452.00
	8/27/15	DISPUTE-CHA	CRJ	7,500.00		39,952.00
	9/8/15	0908scrubsco	CRJ		7,500.00	32,452.00
	9/8/15	1157	CRJ _		1,000.00	31,452.00
port Total				535,146.24	503,694.24	31,452.00
100			-			~;

/22/2015 3:57 PM	FAX 409 763 1084 CELESTE STEIN DESIGNS	@ 0007/000Y
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	Ship TO: 5368 Pir West Chester, O	H 4506
14	B, 11 70.	
	8216 Prince for 6	lendale 1
	Box 199 West Chester, OH 4506	5
	West Chester, OU	

#### **UPS: Tracking Information**

Page 1 of 1



**Proof of Dollvory** 

Close Window

Dear Customor,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:

127263040348392840

Sprvica:

**UPS** Ground

Wolpht

92.00 lbs

Shippod/Billed On:

06/05/2015 08/03/2015 2:13 P.M.

Delivered On: Delivered To:

5368 PINECASTLE CT WEST CHESTER, OH, US 45069

Loft At:

Mol Customer Woman

Thank you for giving us this apportunity to serve you.

Sincarely,

UPS

Tracking results provided by UPS: 07/16/2015 12:29 P.M. ET

Print This Page

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#### UPS: Tracking Information

Page 1 of 1



**Proof of Dollvery** 

Close Window

Dear Gustomor,

Tria notice serves as proof of delivery for the shipment listed below. 127263040346226988 Tracking Numbers

UPS Ground Weight 27.00 ha ShippediBitled On: Dollvered On: 08/05/2016 05/10/2015 \$:14 P.M. 6368 PINECASTLE CT WEST CHESTER, OH, US 46089 Delivered To:

Loft At Porch

Thank you for giving us this opportunity to serve you.

Sincorety, UPS

Tracking results provided by UPS: 07/16/2015 12:33 P.M. ET

Print This Page Close Window

#### Renee Rochkind

From:

Renee Rochkind

Sent:

Friday, July 10, 2015 3:39 PM

To:

'tom landrith'; Cutieful 4U

Cc:

Celeste Stein; Dori Golan; 'alton@actlaw.com'

Subject:

RE: Past Due Invoices

No it would not help but thank you for the ofer.

You are under the impression that we discontinued doing business with you. We are not shipping at this time because of your outstanding balance on past due invoices totalling \$34,452.00. This has caused a serious breakdown in our business relationship. Distributors are expected to pay on time. Since this is not happening you have lost your distributorship. Please retain an attorney in Texas. The law firm of Alton Todd will be in touch.

Renee Rochkind

From: tom landrith [mailto:tomlandrith@gmail.com]

Sent: Friday, July 10, 2015 1:38 PM

To: Cutieful 4U

Cc: Renee Rochkind; Celeste Stein; Dori Golan

Subject: Re: Past Due Invoices

Rence,

If it would help we can return some inventory to help offset our outstanding debt?

Tom

On Fri, Jul 10, 2015 at 2;34 PM, Cutieful 4U < cutieful 4U < cutieful 4u@gmail.com > wrote: Hello All.

Your decision to discontinue our business relationship has caused us to have serious financial issues in the short term. We will continue to make payments on a weekly basis. If you choose to use legal representation we will work directly with him or her.

Tom

On Fri, Jul 10, 2015 at 1:28 PM, Renee Rochkind < Renec Rochkind@celestestein.com > wrote:

Tom,

A check was received today for \$1,500,00. This is not acceptable.

The invoices listed below will need to be paid in full by Monday, July 13, 2015. If we do not receive it will be turned over to a lawyer.



Inv. 16904 \$11,580.00

Inv. 16938 \$ 810.00

Inv. 16939 \$22,062.00

TOTAL \$34,452.00

Renee Rochkind

Collections

Cutieful Distribution
ph. 513-892-9265
that 513-874-5486
cutieful4u@gmail.com
www.cutieful4U.com

Tom Landrith
Cutieful Distribution

Independent Rep for Barco Uniforms

cell: 513-238-7190 fax: 513-874-5486 tomkindrith@gmail.com

### **Cutieful Distribution**

8216 Princeton-Glendale Road Box 199

West Chester, OH 45069

Tel: (513)892-9265

Fax: (513)874-5486

cutieful4u.com

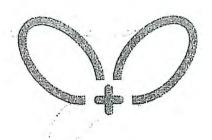
. 4.214 - 2.125 Lat. 22



### Price List Effective October 15, 2015

Cutieful Compression So	cks	
0815 MM HG	All Designs	\$ 6.50 EA
Purse Key Finders	All Designs	\$ 3.95 EA
Pepper Spray		
	Spitfire	\$ 8.99 EA
	Hard Case	\$ 5.99 EA
	Lipstick	\$ 5.99 EA
	Runner	\$ 5.99 EA
	Camo	\$ 5.99 EA
	Floral Designer	\$ 5.99 EA





# cutieful



# We're Back!

New catalog, new designs, new packaging. Enclosed you will find our new catalog and order form.

Hope you like it!

Special Sale 9

# **Buy 36 Pieces**

(Finders Key Purse and Pepper spray included)

**SAVE 10%** 

Write SALE on the top of the order form and we will take care of the rest.

Thank you for your past support.
We look forward to working with you in the future.

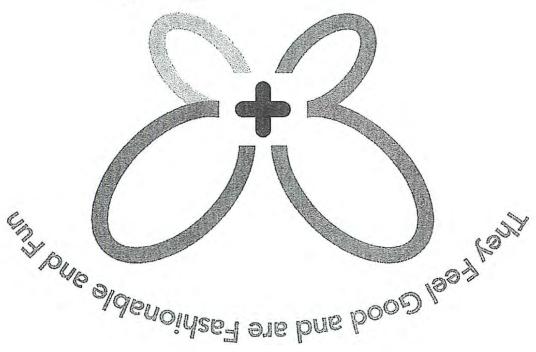


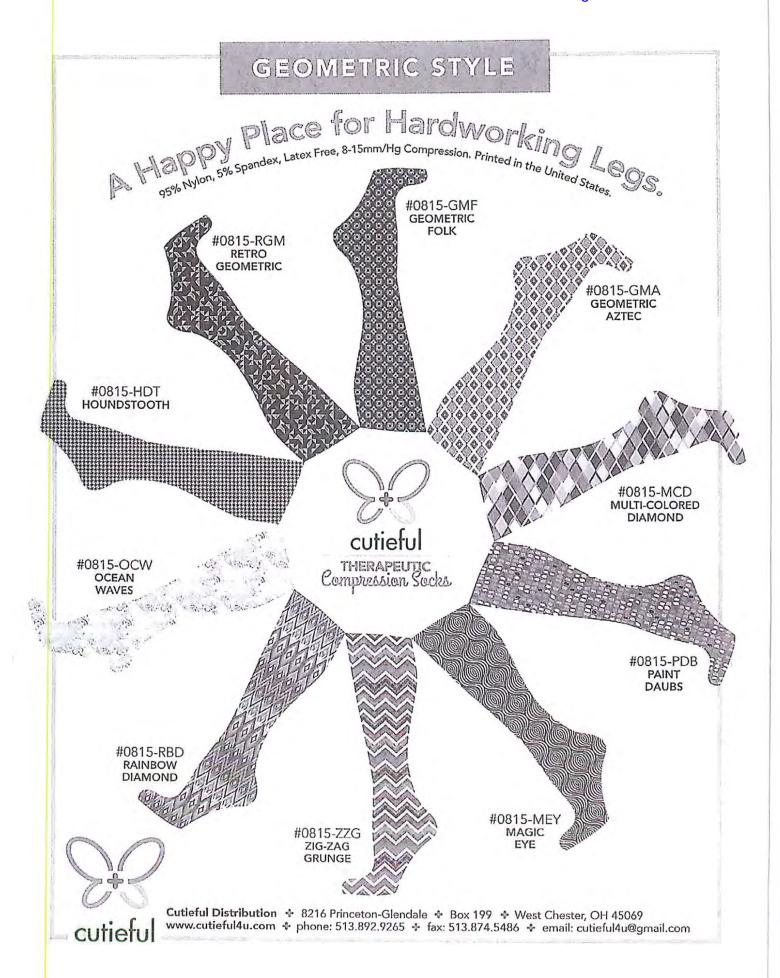
Cutleful Distribution & 8216 Princeton-Glendale & Box 199 & West Chester, OH 45069 www.cutieful4u.com & phone: 513.892.9265 & fax: 513.874.5486 & email: cutieful4u@gmail.com



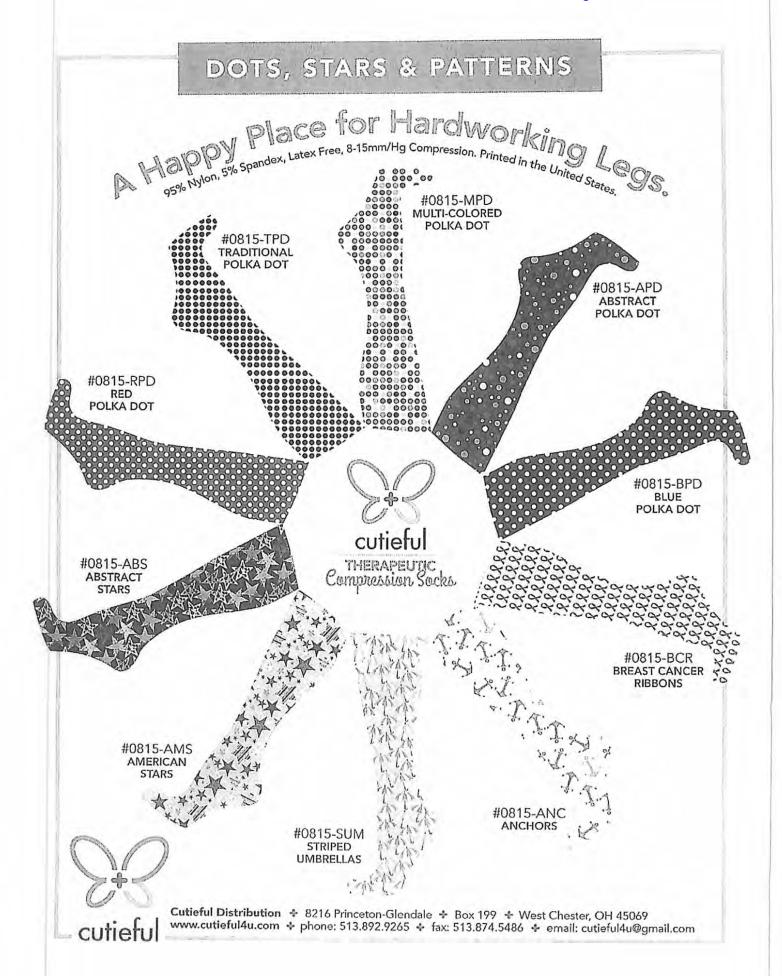
# THERAPEUTIC Compression Socks

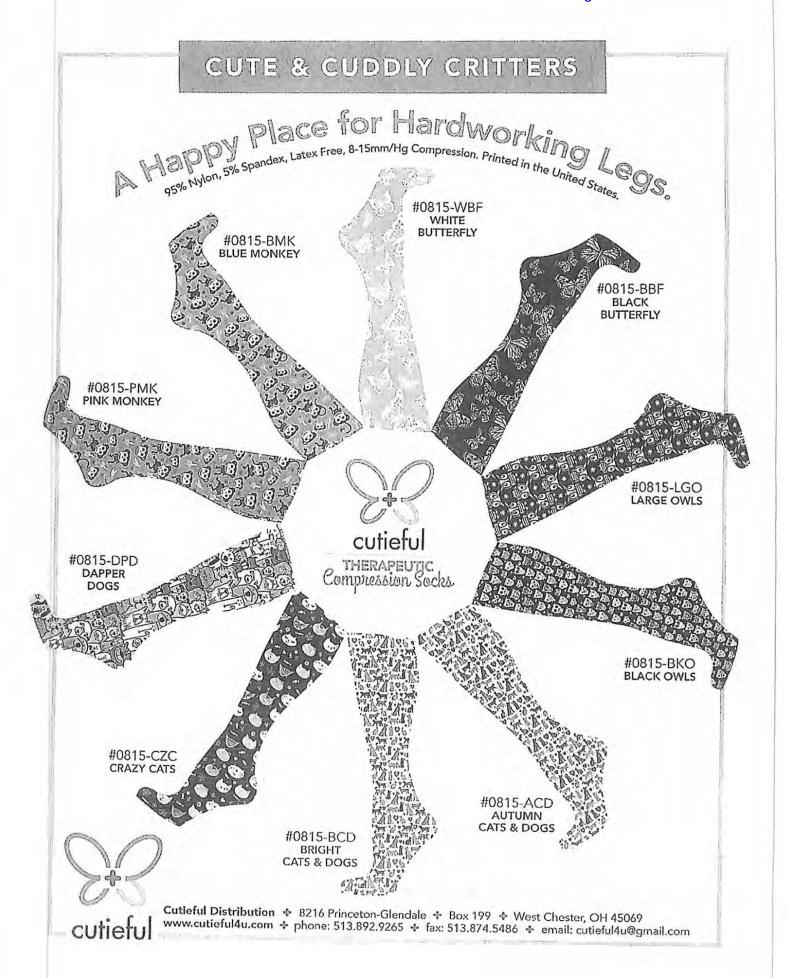
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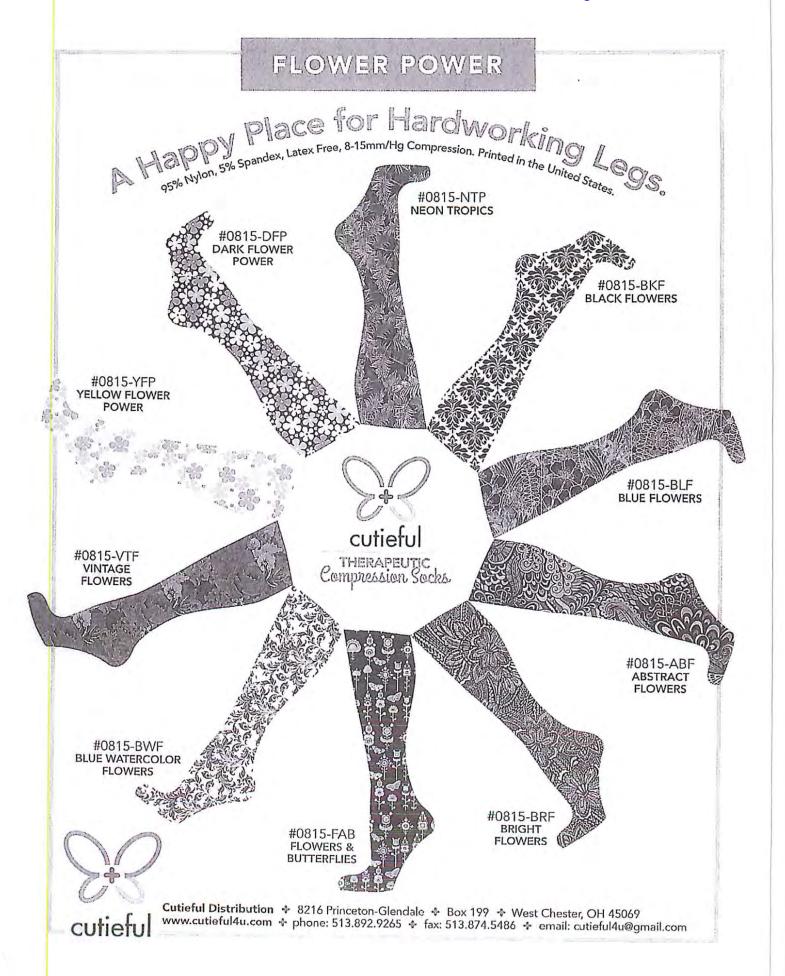


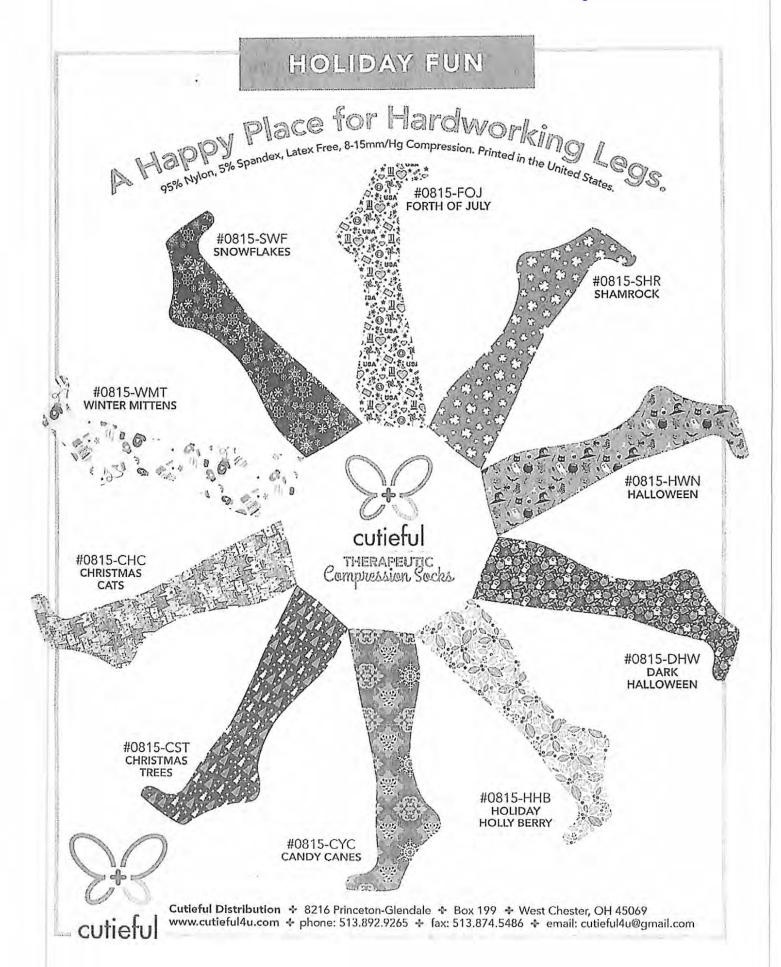














# cutieful

Distribution

Formerly Scrubsco LTD

THINGS. SOLD EXCLUSIVELY TO UNIFORM AND SCRUB
STORES, MED SUPPLY RETAILERS AND GIFT SHOPS

www.cutieful4u.com

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Email: cutieful4u@gmail.com

PORTRETAIN TOURS

-



CHILD WITH



# THERAPEUTIC COMPRESSION SOCKS CELESTE STEIN

Who Said Compression Hosiery Can't Be Fashionable?

CELESTE STEIN Ultra Sheer Compression Hosiery is designed to help your legs feel great all day! Our hosiery improves circulation with graduated compression, giving your legs the relief they need while traveling, working, walking or just sitting.



- A. 218 Heaven 8-15 mmHg 643429 15-20 mmHg 111111
- B. 341 Powers 8-15 mmHg 111111 15-20 mmHg 111111
- C. 593 Hairy Leopard 8-15 mmHg 643478 15-20 mmHg 111111

- F. 1345 Tan Brn Plaid 8-15 mmHg 111111 15-20 mmHg 643554
- D. 809 Zebra G. 1415 Katie's Lace
  8-15 mmHg 11111
  15-20 mmHg 643551
  E. 1054 Midnight Lace
  8-15 mmHg 643502
  H. 1576 Denim Dotty
  8-15 mmHg 643486
  15-20 mmHg 111111
  15-20 mmHg 111111
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  15-20 mmHg 111111
  15-20 mmHg 111111 15-20 mmHg 111111 I. 1609 Sml Blk Versache L.
  - 8-15 mmHg 643437 15-20 mmHg 111111
- J. 1669 Madison 8-15 mmHg 111111 15-20 mmHg 643536
- K. 1721 Raspberry Hill N. 8-15 mmHg 111111 15-20 mmHg 111111 1722 Cougar Denim O. 1867 Pink Diva 8-15 mmHg 643387 15-20 mmHg 111111
- M. 1780 Lexi 8-15 mmHg 111111
- 15-20 mmHg 643528 1785 Black Paisley 8-15 mmHg 643411 15-20 mmHg 111111
  - 8-15 mmHg 643403 15-20 mmHg 111111
- P. 1893 Navy Unica 8-15 mmHg 643494 15-20 mmHg 111111
- Q. White (not pictured) 8-15 mmHg 111111 15-20 mmHg 643569

Radial Socks ad 071313.indd 1

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## THERAPEUTIC COMPRESSION SOCKS CELESTE STEIN,

Who Said Compression Hosiery Can't Be Fashionable?

CELESTE STEIN Ultra Sheer Compression Hosiery is designed to help your legs feel great all day! Our hosiery improves circulation with graduated compression, giving your legs the relief they need while traveling, working, walking or just sitting.



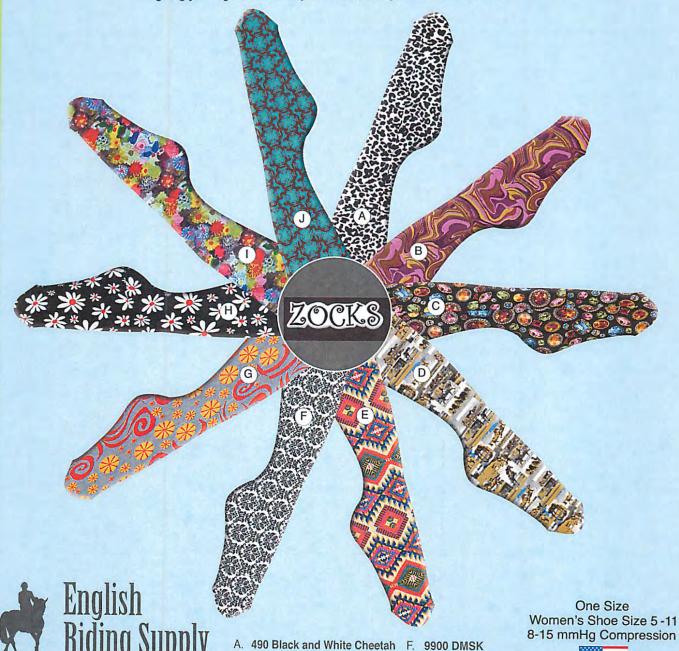
- A. 218 Heaven 8-15 mmHg 643429 15-20 mmHg 648782
- B. 341 Austin Powers 8-15 mmHg 648725 15-20 mmHg 648741
- C. 593 Hairy Leopard 8-15 mmHg 643478 15-20 mmHg 648808
- D. 809 Flow Zebra 8-15 mmHg 648709 15-20 mmHg 643551
- 8-15 mmHg 643395 15-20 mmHg 648766
- F. 1345 Tan/Brn Plaid 8-15 mmHg 648691 15-20 mmHg 643544
- G. 1415 Katie's Lace 8-15 mmHg 648667 15-20 mmHg 643502
- E. 1054 Midnight Lace H. 1576 Denim Dotty 8-15 mmHg 643486 15-20 mmHg 648816
  - 8-15 mmHg 643437 15-20 mmHg 648790
- J. 1669 Madison 8-15 mmHg 648683 15-20 mmHg 643536
- 8-15 mmHg 648733 15-20 mmHg 648758
- 1609 Sml Blk Versache L. 1722 Cougar Denim O. 1867 Pink Diva 8-15 mmHg 643387 15-20 mmHg 648832
- M. 1780 Lexi 8-15 mmHg 648675
- 15-20 mmHg 643528 K. 1721 Raspberry Hill N. 1785 Black Paisley 8-15 mmHg 643411
  - 15-20 mmHg 648744 8-15 mmHg 643403 15-20 mmHg 643510
- P. 1893 Navy Unica 8-15 mmHg 643494 15-20 mmHg 648824
- Q. White (not pictured) 8-15 mmHg 648717 15-20 mmHg 643569

0

# THERAPEUTIC COMPRESSION ZOCKS

Make a fashionable statement .... ride in comfort!

Compression Zocks are designed to help your legs feel great all day! They improve circulation with 3 points graduated compression, giving your legs the relief they need while riding, working, and walking.



www.EnglishRidingSupply.com

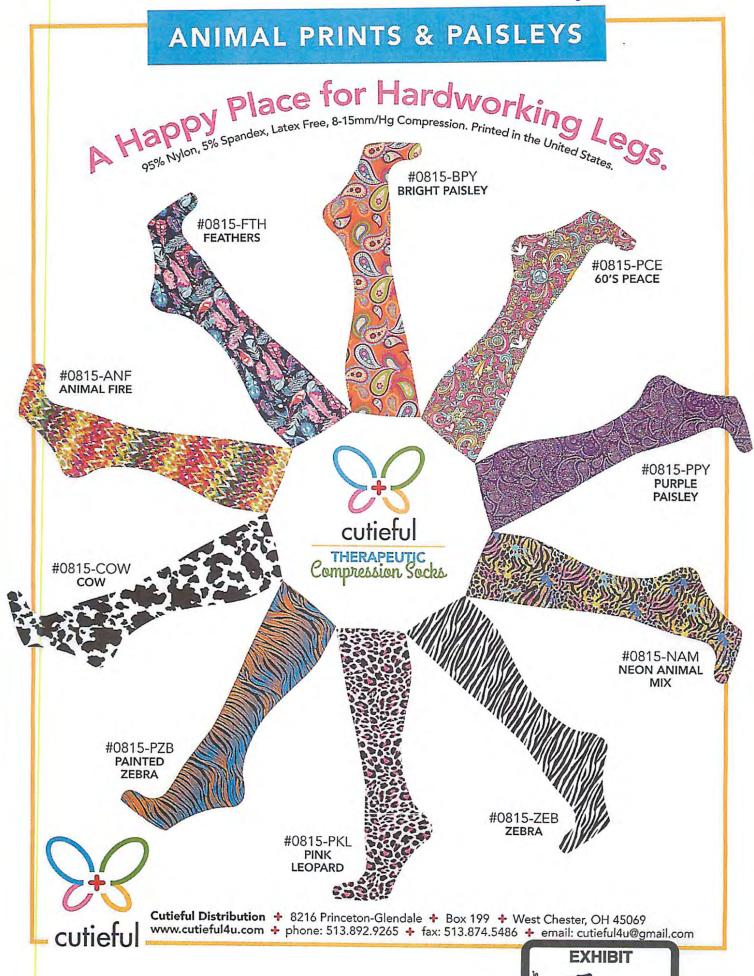
Phone: 1.866.569.1600

- B. 1544 Dark Intoxicate
- C. 1935 Bedazzled Black
- D. 1946 Horse Collage
- E. 1936 Cream Aztec
- G. 1944 Tribe Vibe
- H. 1945 60's Red Daisy
- l. 1870 Meg
- J. 1947 Horses In Horses Out



469211

**Therapeutic Compression Zocks** 







Case 3:16-cv-00297 Document 1-4 Filed in TXSD on 10/19/16 Page 121 of 136





CART 0 item(s) →

SEARCH.

Home Footwear Socks Cutieful Cutieful Compression Socks Kitty

### Cutieful Compression Socks Kitty

Hover over image to zoom



Pinit G+1 > Tweet





\$15.98

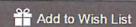
By:

Cutieful

Product Code:

**CMPS-264** 

Availability:





#### DESCRIPTION

Cutieful Compression Socks Kitty

Cutieful Ultra Sheer Compression Hosiery is designed to help your legs feel great all day. They improve circulation with graduated compression, giving you legs the relief they need while traveling, working, walking or just sitting.





Cutieful Compress...
\$15.98

EXHIBIT N









Construction Workwear, Footwear Medical Uniforms, Footwear, Lab Culinary Apparel, Footwear & Coats and Equipment and Equipment

Terms and Conditions

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Sitemap

Yoga / Pilates Apparel & Equipment Equipment

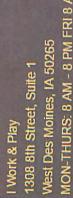
Promos / Sale New Products

Giff Ideas / Suggestions Contact Us









AON-THURS: 8 AM - 8 PM FRI 8 AM - 7 PM SAT: 11 customerservice@iworkandplay.com AM-7 PM SUN: 11 AM - 4 PM 515-330-7125



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Password:

Forgot Password

Your shopping cart is

empty!

Cart Summary

Shop By Category

Thigh Highs

Socks

Leggings Tights

Please Select a Category

Or browse by catagory

Search for all words

breast cancer

**EXHIBIT** 

Search Prints

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# este Stein THE AMERICAN PRINTCESS

# Well Knock Your Socks Of

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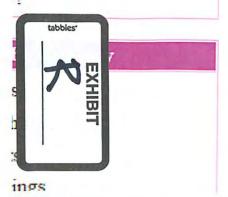
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Rainbow Zebra



Rainbow Zebra - #466



Fuchsia Pink Zebra Flow -#603

Turq Zebra

200000

Electric Pink Zebra

Green Zebra

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Construction Workwear, Footwear and Equipment Medical Uniforms, Footwear, Lab Coats and Equipment

Yoga / Pilates Apparel & Equipment

Culinary Apparel, Footwear & Equipment

Products -

CART 0 item(s)

Cutieful

Socks

Home Footwear

Cutieful

SEARCH.

Gift Ideas / Suggestions

Contact Us

Promos / Sale

New Products

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□ CART 0 item(s) →

SEARCH.

Home / Footwear / Socks / Cutieful / Cutieful Compression Socks Blue Cougar

Denim

### Cutieful Compression Socks Blue Cougar Denim

Hover over image to zoom



Pinit G+1



\$15.98

By:

Cutieful

Product Code:

CMPS-1722

Availability:



Add to Wish List



#### DESCRIPTION

Cutieful Compression Socks Blue Cougar Denim

Cutieful Ultra Sheer Compression Hosiery is designed to help your legs feel great all day. They improve circulation with graduated compression, giving you legs the relief they need while traveling, working, walking or just sitting.

Culinary Apparel, Footwear & Equipment

Yoga / Pilates Apparel & Equipment

New Products Promos / Sale Contact Us

Gift Ideas / Suggestions

₩ CART 0 item(s) -

SEARCH...

Home Footwear Socks Cutieful Cutieful Compression Socks Breast Cancer

### Cutieful Compression Socks Breast Cancer

Hover over image to zoom



\$15.98

By:

Product Code:

Cutieful

CMPS-1247

Availability:



Add to Wish List



#### DESCRIPTION

Cutieful Compression Socks Breast Cancer

Cutieful Ultra Sheer Compression Hosiery is designed to help your legs feel great all day. They improve circulation with graduated compression, giving you legs the relief they need while traveling, working, walking or just sitting.



П

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wish List

**CHECKOUT** 

LOGIN



Products +

Medical Uniforms, Footwear, Lab Coats and Equipment

Construction Workwear, Footwear and Equipment

Culinary Apparel, Footwear & Equipment

Yoga / Pilates Apparel & Equipment

New Products

Promos / Sale

Contact Us Gift Ideas / Suggestions

₩ CART 0 item(s) -

SEARCH...



Home Footwear Socks Cutieful

Cutieful Compression Socks Doggie

### Cutieful Compression Socks Doggie

Hover over image to zoom



\$15.98

By:

Cutieful

Product Code:

**CMPS-265** 

Availability:

Add to Wish List

Add to Cart

#### DESCRIPTION

Cutieful Compression Socks Doggie

Cutieful Ultra Sheer Compression Hosiery is designed to help your leas feel great all day.



### Case 3:16-cv-00297 Document 1-4 Filed in TXSD on 10/19/16 Page 133 of Filed 1/27/2016 3:30:00 PM

NO. 15-CV-1174

Galveston County, Texas Envelope No. 8823345 By: Shailja Dixit 1/27/2016 3:32:20 PM

CELESTE STEIN DESIGNS, INC.	§	IN THE DISTRICT COURT OF
PLAINTIFF,	§	
	§	Care and Control of the Control of the Care and
VS.	§	GALVESTON COUNTY, TEXAS
	§	
SCRUBSCO LTD., and	§	
THOMAS LANDRITH	§	
DEFENDANTS.	§	405 <sup>TH</sup> JUDICIAL DISTRICT COURT

#### DISCOVERY AND DOCKET CONTROL ORDER

1.	02-20-16	New Parties shall be joined and served by this date.
2.	06-03-16	<b>EXPERTS</b> for all Plaintiffs shall be designated by this date.
3.	<u>07-01-16</u>	<b>EXPERTS</b> for all <b>OTHER PARTIES</b> shall be designated by this date (30 days after date Plaintiffs experts are ordered to be designated).

Any party designating a testifying expert witness is **ORDERED** to provide no later than the dates set for such designation, the information set forth in Rule 194.2(f) and a written report prepared by the expert setting the substance of the experts opinions, unless a deposition is taken of the expert

An expert not designated prior to the ordered deadlines shall not be permitted to testify absent a showing of good cause.

4.	<u>09-16-16</u>	<b>DISCOVERY</b> deadlines controlled by designation of case. Counsel may by written agreement continue discovery beyond this deadline. Such continued discovery, however, will not delay the trial date without the Court's approval.						
	-	Level One-(Rule 190.2) Discovery shall be completed 30 days before the date set for trial						
		No. of hours per side for oral depositions:  No. of written interrogatories that maybe served by any party on another party:  (Excluding interrogatories asking a party to identify or authenticate specified documents).						
		Level Two-(Rule 190.3) Discovery shall be completed the earlier of 30 days before the date set for trial or 9 months after the date of the first oral deposition of the due date of the first response to written discovery.						
8		Level Three-(Rule 190.4) Discovery shall be completed by this date.						
		No. of hours per side for oral depositions:						
		No. of written interrogatories that maybe served by any party on another party:(Excluding interrogatories asking a party to identify or authenticate specified documents).						
5.	<u>09-30-16</u>	Pleadings must be amended or supplemented by this date, except by written agreement of all parties.						
6.	<u>07-01-16</u>	Mediation shall be completed by this date. Objections to mediation of the case must be filed within thirty days of this date. Within 5 days of mediating the case, the parties must file a joint statement to the court that they have mediated in good faith and include the date of mediation.						

Parties are ordered to participate in mediation with the following person to serve as mediator:

Name; Address Phone: Fax No.	Hoer 1833 281-	Hoerster ster Media 3 Egret Ba 335-4939 335-4940		Houston T	X 77058					
be filed	ection to the ap with the court r with whom th	within 10 d	lays of th	is order. V	Vithin this 1	0 day peri	od, parties n			
7.	08-20-16 DEADLINE TO FILE ALL MOTIONS, except Motions in Limine, AND MOVANT TO SECURE DATES AND TIMES FOR HEARINGS. NO HEARINGS WILL BE SET UNTIL A MOTION AND ORDER SETTING HEARING ARE ON FILE WITH THE CLERK This includes motions to exclude expert testimony and any other challenges to expert testimony. (Six weeks prior to pre-trial)									
8.	10-17-16 at 9 file any writt heard at pret motions to co prosecution o	en objecti rial confe ntinue at 1	ons to wi ence. Co this settin	tnesses, ex urt will al ig. Failur	chibits or so hear an	motion in nounceme	limine. ut of	re pretrial, All objec parties a dismissa	ctions w ind writ	rill be ten
9.	at least one week parties will ag			ties are or	derd to excl		ek docket co ollowing an			date. At the
				Motion in l Exhibit Lis Labeled an Witness Li	Limine t d numbered	l exhibits court at ea	of fact and			5
10.	<u>11-08-16</u> at	9:30	_AM_	Trial bef	ore court is	set.				
Propose	d Findings of F	act and Co	nclusions	of Law to	be exchang	ged prior to	trial date.			
SIGNED	O on		No	201	6.					
							HTER, JUD STRICT C			

SIGNED by Counsel and/or Pro Se parties:

Alton C. Todd

The Law Firm of Alton C. Todd

Texas Bar No. 20092000

312 S. Friendswood Drive

Friendswood, Texas 77546

281-992-8633

281-648-8633 fax

ATTORNEY FOR PLAINTIFF, CELESTE STEIN DESIGNS, INC.

Justin W. R. Renshaw

Texas Bar No. 24013392

2900 Weslayan, Suite 230

Houston, Texas 77027

713-400-9001

713-400-9006 fax

ATTORNEY FOR DEFENDANTS, SCRUBSCO, LTD., AND THOMAS LANDRITH

Location : Galveston County Images

Case Summary Case No. 15-CV-1174

Celeste Stein Designs, Inc vs. Scrubsco, Ltd., Et Al

Skip to Main Content Logout My Account Search Menu New Case Search Refine Search Back

§ § § š

Case Type: Other Civil - Cases Date Filed: 11/03/2015 Location: 405th District Court Judicial Officer: Slaughter, Michelle

PARTY INFORMATION

Defendant Landrith, Thomas

5368 Pinecastle

West Chester, OH 45069

Lead Attorneys Justin R. Renshaw Retained 713-400-9001(W) 713-400-9006(F)

justin@renshaw-norwood.com

Defendant Scrubsco, Ltd.

c/o Registered Agent Thomas Landrith

5368 Pinecastle

West Chester, OH 45069

Justin R. Renshaw

Retained 713-400-9001(W) 713-400-9006(F)

justin@renshaw-norwood.com

Plaintiff Celeste Stein Designs, Inc

312 S Friendswood Dr

N/A

Friendswood, TX 77546

Retained 281-992-8633(W) 281-648-8633(F) alton@actlaw.com

Alton C. Todd

#### EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS

Original Petition - OCA 11/03/2015

Petition

11/03/2015 Request for Civil Service

Request-Issue 2 citations-mail to atty-assigned to Rolande K

11/05/2015 Citation Issuance - Work Product

Issued 1 citation-mailed to atty along with SC sheet on 11/5/15 LK

11/05/2015 Citation Issuance - Work Product

Issued 1 citation-mailed to atty along with SC sheet on 11/5/15 LK

12/14/2015 <u>Affidavit</u>

Affidavit Affidavit

12/14/2015 Affidavit

12/28/2015 Original Answer

Defendant Landrith Original Answer.

12/28/2015 Original Answer

Defendant Scrubsco Answer

01/26/2016 Court Coordinator's Case Notes

Dates given to Faith in Alton Todd's office PTC 10-17-16/BENCH TRIAL 11-8-16

01/27/2016 Proposed Order (unsigned) DCO; to CRT.

01/28/2016 Status Conference (10:00 AM) (Judicial Officer Slaughter, Michelle)

02/02/2016 Docket Control Order (Judicial Officer: Slaughter, Michelle )

07/01/2016 Designation of Witness

Defendants' Designation of Expert Witnesses

07/07/2016 Designation of Witness No Fee Documents

09/20/2016 Amended Petition

Plaintiff's First Amended Petition

10/07/2016 Attorney Vacation Letter Attorney Vacation Letter

10/17/2016 Pre-Trial Conference (9:00 AM) (Judicial Officer Slaughter, Michelle)

bench trial set for 11-8-16 at 9:30am

11/08/2016 Bench Trial (9:30 AM) (Judicial Officer Slaughter, Michelle)

**Unofficial Record**